

Appendices

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Appendix A

Biological Resources Assessment

May 2, 2023

JN 191844

Jazmin Martin
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

SUBJECT: Results of a Biological Resources Assessment for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project – Los Angeles Department of Water and Power, City of Los Angeles, County of Los Angeles, California

Dear Ms. Martin:

Michael Baker International, Inc. (Michael Baker) has prepared this report to document the results of a biological resources assessment for the proposed Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (proposed project) located in the City of Los Angeles, County of Los Angeles, California. Michael Baker conducted a thorough literature review and a field survey to confirm existing site conditions and assess the potential for special-status plant and wildlife species¹ that have been documented in the project region or that are likely to occur on or within the Scattergood property (survey area). Specifically, this report provides a detailed assessment of the suitability of the on-site habitat to support special-status plant and wildlife species that were identified during reviews of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB; CDFW 2023), the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CIRP; CNPS 2023), the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation project planning tool (IPaC; USFWS 2023a), and other databases as potentially occurring in the vicinity of Scattergood.

Project Description

The Los Angeles Department of Water and Power proposes to construct and operate a rapid-response combined-cycle generation system (CCGS) at Scattergood Generating Station (Scattergood). The CCGS would be capable of operating on a fuel mixture of natural gas and a minimum of 30 percent hydrogen

¹ As used in this report, “special-status” refers to plant and wildlife species that are federally-/State-listed, proposed, or candidates; plant species that have been designated a California Rare Plant Rank species by the California Native Plant Society; wildlife species that are designated by the California Department of Fish and Wildlife as Fully Protected, Species of Special Concern, or Watch List species; State/locally rare vegetation communities; and species that warrant protection under local or regional preservation policies.

gas. Scattergood is located in the Playa del Rey community of the City of Los Angeles at the intersection of Vista Del Mar and Grand Avenue. Grand Avenue, an east-west thoroughfare, divides the Scattergood property into northern and southern parcels. The CCGS would be located in the southwest corner of Scattergood on an approximately 3-acre vacant area previously occupied by Unit 3, which was demolished in 2017-2018. The floor of this area, which has been paved, lies approximately 30 feet below the surrounding grade, creating a basin. Additional facilities, including a wet-surface air cooler, gas compressor units, and switchyard improvements would be located in the central portion of Scattergood. In addition, the eastern portion of the southern parcel (south of Grand Avenue) would serve as a materials laydown and employee parking area for the proposed project construction.

Project Location

Scattergood is generally located east of the Pacific Ocean, south of Imperial Highway, and west of California Highway 1 in the City of Los Angeles, Los Angeles County, California (refer to Figure 1, *Regional Location Map*, in Attachment A). Scattergood is located in Section 37 of Township 3 South, Range 15 West on the U.S. Geological Survey's (USGS) *Venice, California 7.5-minute* quadrangle. Specifically, Scattergood is located along the eastern side of the intersection of Vista del Mar and Grand Avenue, south of Hyperion Water Reclamation Plant, and west of Loma Vista Street. Residential uses surround Scattergood to the northeast and east, and the Chevron El Segundo Refinery is located to the south. The project site totals approximately 52.5 acres and includes the southern portion of Assessor Parcel Number (APN) 4131-028-900 and all of APNs 4131-027-901 and 4131-027-900 (refer to Figure 2, *Project Site*, in Attachment A).

Methodology

Literature Review

Michael Baker conducted thorough literature reviews and record searches within a 5-mile radius of Scattergood to determine which special-status biological resources have the potential to occur on or within the general vicinity. Previous special-status plant and wildlife species occurrence records within the USGS *Venice, Inglewood, Torrance, and Redondo Beach, California 7.5-minute* quadrangles were determined through a query of the CNDDDB (CDFW 2023) and CIRP (CNPS 2023), and for the project region through a review of the IPaC (USFWS 2023a).

The current regulatory/conservation status of special-status plant and wildlife species was verified through lists and resources provided by the CDFW, specifically the *Special Animals List* (CDFW 2022a), *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2022b), *State and Federally Listed Endangered and Threatened Animals of California* (CDFW 2022c), and *State and Federally Listed Endangered, Threatened, and Rare Plants of California* (CDFW 2022d). USFWS-designated Critical Habitat for species listed under the federal Endangered Species Act (FESA) was reviewed online via the Environmental Conservation Online System: Threatened and Endangered Species Active Critical Habitat Report (USFWS 2023b). In addition, Michael Baker reviewed previously prepared reports, survey results,

and literature, as available, detailing the biological resources previously observed on or within the vicinity of Scattergood to understand existing site conditions, confirm previous species observations, and note the extent of any disturbances that have occurred within the Scattergood property that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status species, as well as the following resources:

- Calflora Database (Calflora 2022)
- Google Earth Pro Historical Aerial Imagery from 1994 to 2021 (Google, Inc. 2023)
- Species Accounts provided by Birds of the World (Billerman et. al 2020)
- Cornell Lab of Ornithology’s eBird Database (eBird 2022)
- *Custom Soil Resource Report for Los Angeles County Area, California* (U.S. Department of Agriculture [USDA] 2023)
- USFWS Critical Habitat Mapper and Environmental Conservation Online System (USFWS 2023b)

Field Survey/Habitat Assessment

Michael Baker biologist John Parent and consulting biologist Kelly Rios conducted a biological field survey/habitat assessment and an El Segundo blue butterfly habitat assessment of the survey area on December 12, 2022, to document existing conditions and assess the potential for the El Segundo blue butterfly and other special-status biological resources to occur within the boundaries of the survey area. Areas adjacent to the Scattergood property were viewed from the public right-of-way and from within the Scattergood property; biologist did not enter adjacent properties. Refer to Table 1 below for a summary of the survey date, timing, surveyor, and weather conditions.

Table 1: Survey Date, Time, Surveyor, and Weather Conditions

Date	Time (start / finish)	Surveyors	Weather Conditions (start / finish)	
			Temperature (°F)	Wind Speed (mph)
December 12, 2022	0900 / 1100	John Parent and Kelly Rios	49 cloudy/ 52 cloudy	8 – 10

All plant and wildlife species observed/detected, as well as dominant plant species within each vegetation community, were recorded. Plant species observed during the field survey were identified by visual characteristics and morphology in the field, while unusual and less familiar plant species were photographed and identified later using taxonomic guides. Plant nomenclature used in this report follows Jepson eFlora (Jepson Flora Project 2022) and scientific names are provided immediately following common names of plant species (first reference only).

Wildlife species were identified by sight, calls, tracks, scat, or other types of evidence. Field guides used to assist with identification of wildlife species during the habitat assessment included *The Sibley Guide to*

Birds (Sibley 2014), *A Field Guide to Western Reptiles and Amphibians* (Stebbins 2013), *Bats of the United States and Canada* (Harvey et al. 2011), and *A Field Guide to Mammals of North America* (Reid 2006). Although common names of wildlife species are well standardized, scientific names are provided immediately following common names of wildlife species in this report (first reference only). To the extent possible, nomenclature of birds follows the most recent annual supplement of the American Ornithological Society's *Checklist of North American Birds* (Chesser et al. 2020), nomenclature of amphibians and reptiles follows *Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, with Comments Regarding Confidence in Our Understanding* (Crother 2017), and nomenclature for mammals follows the *Revised Checklist of North American Mammals North of Mexico* (Bradley et al. 2014).

Existing Site Conditions

The survey area is sloped and terraced with an approximate elevation range of approximately 34 to 160 feet above mean sea level, sloping down to the west. According to the *Custom Soil Resource Report for Los Angeles County, California, Southeastern Part* (USDA 2023), the survey area is underlain almost entirely by Urban land, industrial (9999), with small portions underlain by Urban land-Abaft-Marina complex, 0 to 15 percent slopes (1153) and Urban land-Abaft, loamy surface complex, 5 to 30 percent slopes, terraced (1153).

Based on the history of electricity-generating facilities at this location, the site has been in active use since the late 1950s when construction of the facility began and was brought on-line in 1958. The site currently includes infrastructure located on terraces that drop in elevation from east to west. Most of the site has been developed with paved surfaces, buildings, and electricity-generating infrastructure. Some areas consisting of non-native ornamental vegetative cover occurs on engineered slopes between terraces and along the perimeter of the property. Refer to Attachment B for representative photographs of the survey area taken during the field survey.

Vegetation Communities and Land Cover Types

No natural vegetation communities were observed within the Scattergood property. The entire property has been constructed upon or physically altered to a degree that natural soil substrates and native vegetation communities are no longer supported. Non-native ornamental vegetation occurs in areas that are not developed, with occasional native species. Non-native species observed include acacia (*Acacia* sp.), Mexican fan palm (*Washingtonia robusta*), and eucalyptus (*Eucalyptus* sp.) trees, with hottentot fig (*Carpobrotus edulis*), ripgut brome (*Bromus rigidus*), slender oats (*Avena barbata*), red-stemmed filaree (*Erodium cicutarium*), and other non-native grasses observed as ground cover. Native plants species that were observed include telegraph weed (*Heterotheca grandiflora*) and deerweed (*Acmispon glaber*). Refer to Attachment C for a complete list of plant species observed within the survey area during the field survey.

Wildlife

This section provides a general discussion of common wildlife species that were detected on-site by Michael Baker or that are expected to occur based on existing site conditions. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions during the field survey.

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would support populations of fish were observed in the survey area during the field survey. Therefore, no fish are expected to occur.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable breeding habitat for amphibians were observed within the survey area during the field survey. Therefore, no amphibians are expected to occur.

Reptiles

No reptile species were observed in the survey area during the field survey. The survey area is expected to provide habitat for a limited number of reptilian species that are acclimated to edge or urban environments. The proximity of the survey area to the beach may slightly increase the possibility of lizards occurring on-site. Common reptilian species that may be present within the survey area include western side-blotched lizard (*Uta stansburiana elegans*), Great Basin fence lizard (*Sceloporus occidentalis longipes*), and woodland alligator lizard (*Elgaria multicarinata webbii*).

Birds

A total of six (6) bird species were detected during the field survey, including American crow (*Corvus brachyrhynchos*), yellow-rumped warbler (*Setophaga coronata*), black phoebe (*Sayornis nigricans*), Western gull (*Larus occidentalis*), northern mockingbird (*Mimus polyglottos*), and Anna's hummingbird (*Calypte anna*).

Nesting birds are protected pursuant to the federal Migratory Bird Treaty Act (MBTA) of 1918 and the California Fish and Game Code (CFGC)². To maintain compliance with the MBTA and CFGC, clearance surveys are typically required prior to any ground disturbance or vegetation removal activities to avoid direct or indirect impacts to active bird nests and/or nesting birds. Consequently, if an active bird nest is

² Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the California Fish and Game Code or any regulation made pursuant thereto; Section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey); and Section 3513 makes it unlawful to take or possess any migratory non-game bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act, as amended (16 U.S.C. § 703 *et seq.*).

destroyed or if project activities result in indirect impacts (e.g., nest abandonment, loss of reproductive effort) to nesting birds, it is considered “take” and is potentially punishable by fines and/or imprisonment. Although the survey area provides suitable nesting habitat for various year-round and seasonal bird species, no active nests or birds displaying overt nesting behavior were observed during the field survey.

Mammals

No mammals were detected on-site during the field survey. The survey area provides marginal habitat for a limited number of mammalian species adapted to living in edge or urban environments, particularly opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), domestic dog (*Canis lupus familiaris*), and coyote (*Canis latrans*). Bats occur throughout most of California; however, due to the general design of the buildings and structures on-site, lack of roosting opportunities (e.g., hollow tree trunks/limbs, tree foliage, caves, bridges, buildings), and the complete development of the Scattergood property and lack of naturally occurring vegetation within the survey area, bats are generally not expected to occur within the survey area. Trees are not located within the footprint of the proposed project facilities; therefore, no trees would be removed for the project.

Migratory Corridors and Linkages

Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

The Scattergood property is not located within any wildlife corridors. It is surrounded by developed land to the north, south, and east, and is bordered by Dockweiler State Beach to the west. The developed areas to the north, south, and east provide only minimal to no opportunities for wildlife movement. Though Dockweiler State Beach is the closest likely wildlife corridor to Scattergood, it provides minimal opportunity for movement of wildlife. Wildlife movement into or out of Scattergood is likely reduced by chain-link fencing that surrounds the property, the lack of any connectivity to open space areas, and by the presence of surrounding high-traffic roadways and existing residential developments. Further, elevated noise levels, vehicle traffic, lighting, and human presence associated with the residential and industrial developments and roadways decrease the suitability of the survey area to be used as a wildlife movement corridor or linkage.

State and Federal Jurisdictional Resources

There are three agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The U.S. Army Corps of Engineers (USACE) Regulatory Branch regulates discharge of dredged or fill material into “waters of the U.S.” pursuant to Section 404 of the federal Clean Water Act

(CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the Regional Water Quality Control Board (RWQCB) regulates discharges to surface waters pursuant to Section 401 of the CWA and Section 13263 of the California Porter-Cologne Water Quality Control Act, and the CDFW regulates alterations to streambed and associated vegetation communities under Section 1600 *et seq.* of the CFGC. In addition, for projects located within the Coastal Zone, the California Coastal Commission (CCC) plans and regulates the use of land and water in the Coastal Zone pursuant to the Coastal Act of 1976.

Development projects, which are broadly defined by the California Coastal Act, generally require a coastal development permit from either the CCC or the local government. The City of Los Angeles has a certified Local Coastal Program and serves as the local jurisdiction with authority to issue Coastal Development Permits. However, while Scattergood is adjacent to the Pacific Ocean, the site itself is not in the Coastal Zone boundary as defined by the California Coastal Act. Scattergood is excluded from the Coastal Zone boundary through specific language in the California Coastal Act (Section 30166(c), Chapter 2.5, Division 20, and California Public Resources Code).

No potential jurisdictional drainages or wetland features were observed within the boundaries of the survey area. Therefore, development of the proposed project is not expected to result in impacts to State or federal jurisdictional areas or require regulatory approvals/permits from the USACE, RWQCB, CDFW, or CCC.

Special-Status Biological Resources

The CNDDDB (CDFW 2023) and CIRP (CNPS 2023) were queried for reported locations of special-status plant and wildlife species as well as special-status natural vegetation communities in the USGS *Venice, Inglewood, Torrance, and Redondo Beach, California* 7.5-minute quadrangles, while IPaC (USFWS 2023a) was queried for federally-listed species known from the project region. The biological field survey/habitat assessment was conducted to assess and evaluate the conditions of the habitat(s) within the boundaries of the survey area to determine if the existing vegetation communities have the potential to provide suitable habitat(s) for special-status plant and wildlife species. Additionally, the potential for special-status species to occur within the survey area were determined based on the reported occurrence locations in the CNDDDB, CIRP, and Calflora databases and the following criteria:

- **Present:** the species was observed or detected within the survey area during the field survey.
- **High:** Recent (within 20 years) occurrence records indicate that the species has been known to occur on or within 1 mile of the survey area, and the site is within the normal expected range of this species. Intact, suitable habitat preferred by this species occurs within the survey area and/or there is viable landscape connectivity to a local known extant population(s) or sighting(s).
- **Moderate:** Recent (within 20 years) occurrence records indicate that the species has been known to occur within 1 mile of the survey area and the survey area is within the normal

expected range of this species. There is suitable habitat within the survey area, but the site is ecologically isolated from any local known extant populations or sightings.

- **Low:** Recent (within 20 years) occurrence records indicate that the species has been known to occur within 5 miles of the survey area, but the site is outside of the normal expected range of the species and/or there is poor quality or marginal habitat within the survey area.
- **Not Expected:** There are no occurrence records of the species occurring within 5 miles of the survey area, there is no suitable habitat within the survey area, and/or the survey area is outside of the normal expected range for the species.

Forty-five (45) special-status plant species and twenty-eight (28) special-status wildlife species were identified during the review of the CNDDDB and CIRP for the USGS *Venice, Inglewood, Torrance, and Redondo Beach California 7.5-minute* quadrangles, which covers a land area of approximately 170 square miles, and in the IPaC for the project region. In addition, three (3) special-status vegetation communities were identified. Special-status plant and wildlife species were evaluated for their potential to occur within the survey area based on specific habitat requirements, availability/quality of suitable habitat, and known distributions of species/populations. Special-status biological resources identified during the literature review are presented in *Table D-1: Potentially Occurring Special-Status Biological Resources*, provided in Attachment D.

Special-Status Plants

A total of forty-five (45) special-status plant species have been recorded in the USGS *Venice, Inglewood, Torrance, and Redondo Beach, California 7.5-minute* quadrangles by the CNDDDB and CIRP and in the project region by the IPaC (refer to Attachment D). No special-status plants were identified in the survey area during the field survey. Based on the results of the field survey and a review of specific habitat preferences, distributions, and elevation ranges, Michael Baker determined that none of the special-status plant species identified during reviews of the CNDDDB, CIRP, and IPaC are expected to occur within the survey area.

Special-Status Wildlife

A total of twenty-eight (28) special-status wildlife species have been recorded in the USGS *Venice, Inglewood, Torrance, and Redondo Beach, California 7.5-minute* quadrangles by the CNDDDB and in the project region by the IPaC (refer to Attachment D). No special-status wildlife species were detected within the survey area during the field survey. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, Michael Baker determined that all but one of the special-status wildlife species identified during reviews of the CNDDDB and IPaC are not expected to occur within the survey area. One species, Western snowy plover (*Charadrius nivosus nivosus*, federally-listed threatened and CDFW Species of Special Concern) has a low potential to occur as a migrating transient, given the proximity to suitable coastal nesting habitat just

west of the survey area. However, there is no suitable nesting or foraging habitat for this species in the survey area.

El Segundo Blue Butterfly

The El Segundo blue butterfly (ESB, *Euphilotes battoides allyni*) is a federally-listed endangered butterfly that spends virtually its entire life cycle in intimate associations with the flowerheads of seacliff or coast buckwheat (*Eriogonum parviflorum*), a native plant species found within and along coastal dunes. As a known ESB population occurs within close proximity to Scattergood, an ESB habitat assessment was performed concurrently with the general habitat assessment performed on December 12, 2022, by Michael Baker consulting biologist Kelly Rios and assisted by Michael Baker biologist John Parent. The ESB habitat assessment determined that the obligate host plant, coast buckwheat, was absent from Scattergood, no suitable ESB habitat would be impacted by the proposed project, and no further surveys or focused surveys for ESB are recommended (see Attachment E, *Results of an El Segundo Blue Butterfly Habitat Assessment for the Scattergood Units 1 and 2 Modernization Project*).

Critical Habitat

Under the definition included in the FESA, designated Critical Habitat refers to specific areas within the geographical range of a species that were occupied at the time it was listed that contain the physical or biological features that are essential to the survival and eventual recovery of that species. Areas of Critical Habitat may require special management considerations or protection, regardless of whether the species is still extant in the area. Areas that were not known to be occupied at the time a species was listed can also be designated Critical Habitat if they contain one or more of the physical or biological features that are essential to that species' conservation and if the other areas that are occupied are inadequate to ensure the species' recovery. If a project may result in take or adverse modification to a species' designated Critical Habitat and the project has a federal nexus, the project proponent may be required to provide suitable mitigation. Projects with a federal nexus may include projects that occur on federal lands, require federal permits (e.g., CWA Section 404 permit), or receive any federal oversight or funding. If there is a federal nexus, then the federal agency that is responsible for providing funds or permits would be required to consult with the USFWS pursuant to the FESA.

Critical Habitat for the Western snowy plover and ESB occur within close proximity (refer to Figure 3, *Critical Habitat*, in Attachment A) to Scattergood. However, the Scattergood property does not coincide with USFWS-designated Critical Habitat for any federally listed species.

Consistency with Local Plans

City of Los Angeles Local Coastal Program

The City of Los Angeles lies partially within the Coastal Zone established under the California Coastal Act. The designated areas within the Coastal Zone are considered to have many special natural and scenic qualities that require protection. The City has a certified Local Coastal Program (LCP) under the CCC

(certified with amendments on July 10, 1985) and thereby can issue Coastal Development Permits for projects under its jurisdiction. As discussed above, Scattergood is not located within the Coastal Zone. Therefore, the policies of the California Coastal Act and LCP do not apply to the proposed project.

Conclusions and Recommendations

The entire survey area is composed of urban/developed land. No other vegetation communities or land cover types occur on-site.

No special-status plant species were observed within the survey area during the field survey. Based on the results of the field survey and a review of specific habitat preferences, distributions, and elevation ranges, Michael Baker determined that none of the special-status plant species identified by the CNDDDB, CIRP, and IPaC are expected to occur within the survey area.

No special-status wildlife species were detected within the survey area during the field survey. Due to the survey area and the surrounding area being completely urbanized, fish, amphibian, reptilian, and mammalian species would not be expected to occur within the survey area. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, Michael Baker determined that the survey area is not expected to support the habitat of any special-status species as identified by the CNDDDB and IPaC, and these species have either a low potential or are not expected to occur within the survey area.

Trees suitable for nesting are not generally located adjacent to areas of Scattergood that would be subject to construction activity. Nonetheless, to ensure no indirect impacts to nesting birds occur, implementation of the Avoidance and Minimization Measure AMM BIO-1 presented below would reduce potential significant impacts to nesting birds that may occur in the project area.

AMM BIO-1

1. A pre-construction nesting bird survey should be conducted by a qualified biologist within 72 hours prior to the start of project construction activities to determine whether active nests are present within or directly adjacent to construction zones. Following completion of the survey, a brief memo report shall be prepared to document the location of all nests found (if any), their status (i.e., eggs or hatchlings present), the species of bird, and existing biological conditions of the project area. If an active nest is found, the following shall be implemented to avoid and minimize impacts to the nest.
 - A qualified biologist shall determine if a nest avoidance buffer zone is necessary to restrict construction activities in proximity to the nest to protect the nest from failing. In determining the need for and establishing the size of any buffer zone, the qualified biologist shall take into account existing baseline conditions (e.g., topography, buffering buildings or other structures, etc.). In addition, observed avian response to disturbances related to existing station operations (e.g., noise and human activity) shall factor into the requirement for and size of a

nest avoidance buffer.

- Any avoidance buffers required around active nests shall be delineated on site with bright flagging or other means, for easy identification by project personnel. The resident engineer and construction supervisor will be notified of the nest and the buffer limits to ensure it is maintained.
- The qualified biologist shall monitor all detected nests, including those with and without an established buffer, at least once per week to determine whether birds are being disturbed. If signs of disturbance or stress are observed, the qualified biologist shall implement adaptive measures to reduce disturbance. These measures could include placing visual screens or sound dampening structures between the nest and construction activity or establishing or increasing buffer distances. The qualified biologist shall monitor each active nest until they determine that nestlings have fledged and dispersed, or the nest is no longer active. Until such a determination is made, construction-related activities that, in the opinion of the qualified biologist, might disturb nesting activities shall be prohibited within nest buffer zones.

With implementation of the avoidance and minimization measure outlined above, the project would result in less than significant impacts to biological resources. No mitigation or additional avoidance and minimization measures are expected to be required for project approval and implementation.

If you have any questions or concerns regarding these findings, please do not hesitate to contact me at (714) 394-5646 or john.parent@mbakerintl.com.

Sincerely,



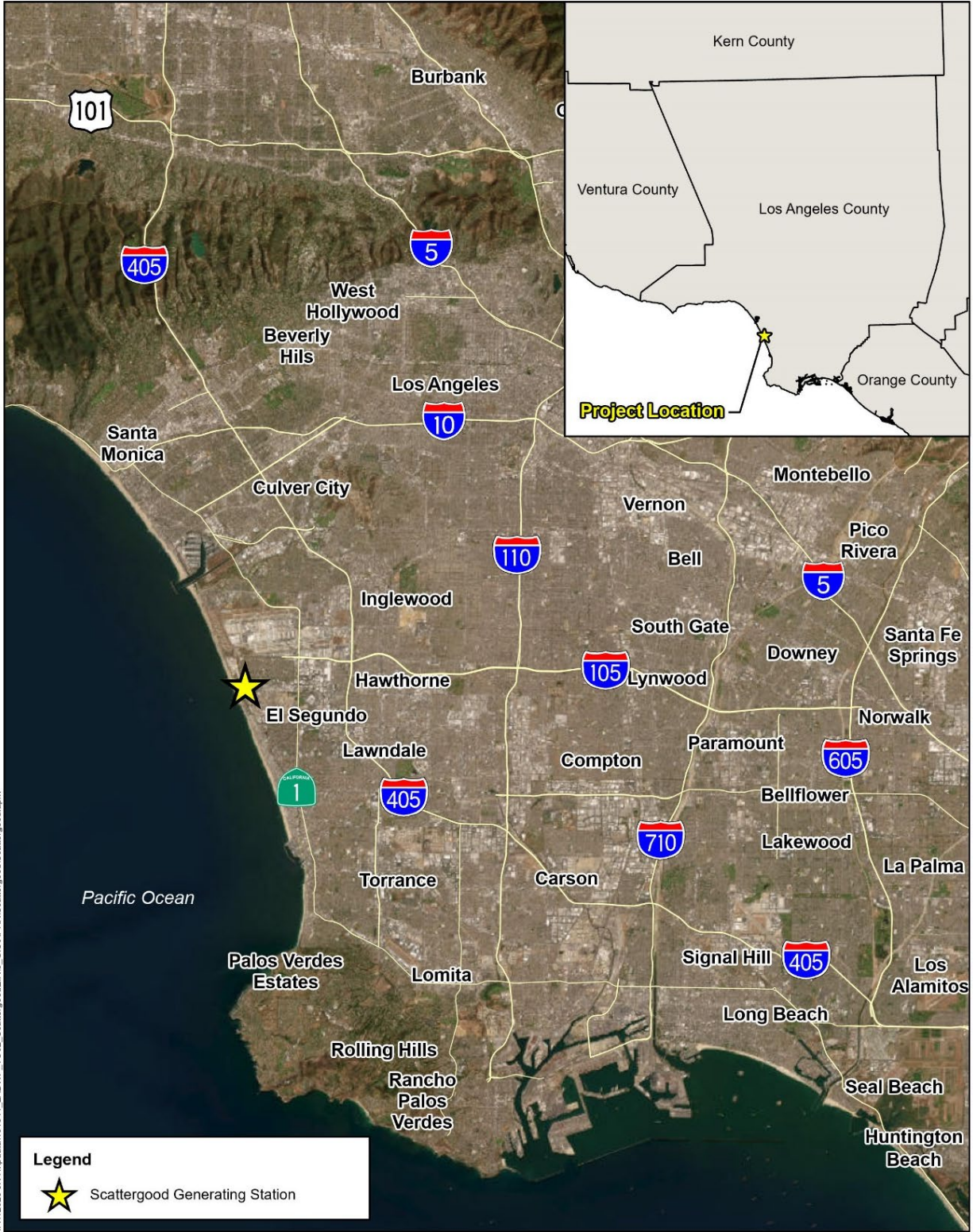
John Parent
Biologist

Attachments:

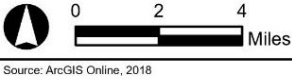
- Project Figures*
- Site Photographs*
- Plant Species Observed List*
- Potentially Occurring Special-Status Biological Resources*
- Results of an El Segundo Blue Butterfly Habitat Assessment for the Scattergood Generating Station Units 1 and 2 Green-Hydrogen Ready Modernization Project*
- References*

Attachment A

Project Figures



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Source: ArcGIS Online, 2018

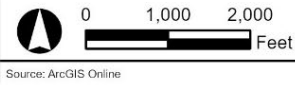
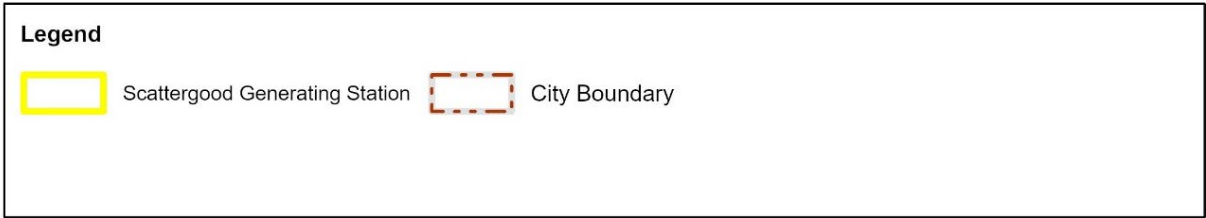
SCATTERGOOD GENERATING STATION UNITS 1 AND 2
GREEN HYDROGEN-READY MODERNIZATION PROJECT

Regional Location Map

Figure 1



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SCATTERGOOD GENERATING STATION UNITS 1 AND 2
GREEN HYDROGEN-READY MODERNIZATION PROJECT

Project Site

Figure 2



SCATTERGOOD GENERATING STATION UNITS 1 AND 2
GREEN HYDROGEN-READY MODERNIZATION PROJECT

Critical Habitat

Figure 3



Source: USFW Critical Habitat (2023), ArcGIS Online

Attachment B

Site Photographs



Photograph 1: Southeast-facing view across the western portion of the Scattergood property from the entrance off Grand Avenue.



Photograph 2: East-facing view across the western portion of the Scattergood property from the entrance off Grand Avenue.



Photograph 3: Northeast-facing view across the western portion of the Scattergood property from the entrance off Grand Avenue.



Photograph 4: North-facing view across the western portion of the Scattergood property from the entrance off Grand Avenue.



Photograph 5: West-facing view across the western portion of the Scattergood property from the entrance off Grand Avenue.

Attachment C

Plant Species Observed List

Plant Species Observed List

<i>Scientific Name*</i>	Common Name	Cal-IPC Rating**	Special-Status Rank
<i>Acacia</i> sp.	acacia		
<i>Acmispon glaber</i>	deerweed		
<i>Avena barbata*</i>	slender oats		
<i>Bougainvillea</i> sp.*	bougainvillea		
<i>Bromus rigidus*</i>	ripgut brome		
<i>Carpobrotus edulis</i>	hottentot fig	High	
<i>Erodium cicutarium*</i>	red-stemmed filaree	Limited	
<i>Eucalyptus</i> sp.*	eucalyptus	Watch-Limited	
<i>Heterotheca grandiflora</i>	telegraph weed		
<i>Malva parviflora*</i>	cheeseweed		
<i>Platanus</i> sp.	sycamore		
<i>Salsola tragus*</i>	Russian thistle	Limited	
<i>Taraxacum</i> sp.	dandelion		
<i>Washingtonia robusta*</i>	Mexican fan palm	Moderate	

* Non-native species

** **California Invasive Plant Council (Cal-IPC) Ratings**

High	These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.
Moderate	These species have substantial and apparent—but generally not severe—ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.
Limited	These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent.
Watch	These species have been assessed as posing a high risk of becoming invasive in the future in California.

Attachment D

Potentially Occurring Special-Status Biological Resources

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
SPECIAL-STATUS WILDLIFE SPECIES				
<i>Agelaius tricolor</i> tricolored blackbird	ST SSC G1G2 S1S2	Range is limited to the coastal areas of the Pacific coast of North America, from Northern California to upper Baja California. Can be found in a wide variety of habitat including annual grasslands, wet and dry vernal pools and other seasonal wetlands, agricultural fields, cattle feedlots, and dairies. Occasionally forage in riparian scrub habitats along marsh borders. Basic habitat requirements for breeding include open accessible water, protected nesting substrate freshwater marsh dominated by cattails (<i>Typha</i> spp.), willows (<i>Salix</i> spp.), and bulrushes (<i>Schoenoplectus</i> spp.), and either flooded or thorny/spiny vegetation and suitable foraging space providing adequate insect prey.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Anniella stebbinsii</i> southern California legless lizard	SSC G3 S3	Locally abundant specimens are found in coastal sand dunes and a variety of interior habitats, including sandy washes and alluvial fans. A large protected population persists in the remnant of the once extensive El Segundo Dunes at Los Angeles International Airport.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Athene cunicularia</i> Burrowing owl	SSC G4 S3	Primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity. Occurs in open, annual or perennial grasslands, deserts, and scrublands characterized by low- growing vegetation. The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Bombus crotchii</i> Crotch bumble bee	CSE G2 S1S2	Found from coastal California east to the Sierra-Cascade crest and south into Mexico. Primarily occurs in California, including the Mediterranean region, Pacific coast, western desert, great valley, and adjacent foothills through most of southwestern California. Has also been recorded in Baja California, Baja California Sur, and in southwest Nevada. Inhabits open grassland and scrub habitats. Primarily nests underground. Food plant genera include <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Charadrius nivosus nivosus</i> western snowy plover	FT SSC G3T3 S3	Occurs on sandy beaches, salt pond levees and along the shores of large alkali lakes. Breeding generally occurs above the high tide line on coastal beaches, sand spits, dune-backed beaches, sparsely vegetated dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries. Nests typically occur in flat, open areas with sandy or saline substrates; vegetation and driftwood are usually sparse or absent.	No	Low. There is no suitable nesting or foraging habitat within the survey area to support this species, however this species could occur as a transient given the close proximity to suitable coastal nesting habitat just west of the survey area.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	FT SE G5T2T3 S1	Found in densely wooded habitat within close proximity to water, including woodlands with low scrubby vegetation, overgrown orchards, abandoned farmland, and dense thickets along streams and marshes.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Coturnicops noveboracensis</i> yellow rail	SSC G4 S1S2	Prefers shallow freshwater sedge marshes; winters in marshes and meadows with cordgrass, saltgrass, sedges, and other low vegetation.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Danaus plexippus</i> pop. 1 monarch butterfly – California overwintering population	FC G4T1T2 S2	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts are located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Empidonax traillii extimus</i> southwestern willow flycatcher	FE SE G5T2 S1	Uncommon summer resident in southern California primarily found in lower elevation riparian habitats occurring along streams or in meadows. The structure of suitable breeding habitat typically consists of a dense mid-story and understory and can also include a dense canopy. Nest sites are generally located near surface water or saturated soils. The presence of surface water, swampy conditions, standing or flowing water under the riparian canopy are preferred.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Emys marmorata</i> Western pond turtle	SSC G3G4 S3	Found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches, with abundant vegetation, either rocky or muddy bottoms, in woodland, forest, and grassland. In streams, prefers pools to shallower areas. Logs, rocks, cattail mats, and exposed banks are required for basking. May enter brackish water and even seawater. Found at elevations from sea level to over 5,900 feet amsl.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Eumops perotis californicus</i> western mastiff bat	SSC G4G5T4 S3S4	Primarily a cliff-dwelling species, roost generally under exfoliating rock slabs. Roosts are generally high above the ground, usually allowing a clear vertical drop of at least 3 meters below the entrance for flight. In California, it is most frequently encountered in broad open areas. Its foraging habitat includes dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, and agricultural areas.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Euphilotes battoides allyni</i> El Segundo blue butterfly	FE G5T1 S1	Suitable habitat is limited to coastal scrub containing the host plant, seacliff buckwheat (<i>Eriogonum parviflorum</i>) within the El Segundo sand dunes along the California coast ranging from the Palos Verde Peninsula to the south and extending north to Ocean Park. This species is now restricted to three locations within the remaining dune habitat.	No	Not Expected. There is no suitable habitat within the survey area to support this species. Although the proposed El Segundo blue butterfly Chevron preserve is adjacent to the project site, this species is unlikely to occur within the survey area given the natural barrier separating the preserve from the survey area as well as the absence of the host plant.
<i>Glaucopsyche lygdamus palosverdesensis</i> Palos Verde blue butterfly	FE G5T1 S1	Suitable habitat is limited to the Palos Verde peninsula to coastal scrub habitats containing the host plants coast locoweed (<i>Astragalus trichopodus lonchus</i>) and deerweed (<i>Acemison glaber</i>). The species is now restricted to two locations within the peninsula.	No	Not Expected. There is no suitable habitat within the survey area to support this species, and the survey area is outside of the known geographical range of this species.
<i>Laterallus jamaicensis coturniculus</i> California black rail	ST FP G3T1 S1	Suitable habitat generally includes salt marshes, freshwater marshes, and wet meadows. Typical associated vegetation includes pickle weed (<i>Salicornia virginica</i>), in salt marshes and bulrush (<i>Scirpus</i> spp.) in less saline habitats.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Microtus californicus stephensi</i> south coast marsh vole	SSC G5T2T3 S2	Found in wetlands and associated grasslands in the immediate coastal zone, ranging from southern Ventura County to northern Orange County.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Nyctinomops femorosaccus</i> pocketed free-tailed bat	SSC G5 S3	Often found in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree (<i>Yucca brevifolia</i>) woodland, and palm oasis habitats. Prefers rocky desert areas with high cliffs or rock outcrops, which are used as roosting sites.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Passerculus sandwichensis beldingi</i> Belding's savannah sparrow	SE G5T3 S3	Found year round in coastal salt marsh habitats of southern California. Ecologically associated with dense pickleweed for nesting.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Pelecanus occidentalis californicus</i> California brown pelican	FP G4T3T4 S3	Found on rocky or vegetated offshore islands, in harbors and marinas, estuaries, shallow breakwaters and sheltered bays. Occasionally seen out at sea.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse	FE SSC G5T1 S2	One of sixteen currently recognized subspecies of little pocket mouse (<i>Perognathus longimembris</i>), which is a widespread species that is distributed throughout arid regions of the western U.S. extending into northern part of Baja California peninsula and west central Sonora, Mexico. Pacific pocket mouse is associated with fine grain, sandy substrates in coastal strand, coastal dunes, river alluvium and coastal sage scrub habitats within 2.5 miles of the ocean in southern California.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Phrynosoma blainvillii</i> coast horned lizard	SSC G3G4 S4	Occurs in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. Its elevational range extends up to 4,000 feet in the Sierra Nevada foothills and up to 6,000 feet in the mountains of southern California. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance (e.g. fire, floods, unimproved roads, grazing lands, and fire breaks). The key elements of such habitats are loose, fine soils with a high sand fraction; an abundance of native ants or other insects; and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Poliioptila californica californica</i> coastal California gnatcatcher	FT SSC G4G5T3Q S2	Yearlong resident of sage scrub habitats that are dominated by California sagebrush. This species generally occurs below 750 feet amsl in coastal regions and below 1,500 feet amsl inland. Ranges from the Ventura County, south to San Diego County and northern Baja California and it is less common in sage scrub with a high percentage of tall shrubs. Prefers habitat with more low-growing vegetation.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Siphateles bicolor mohavensis</i> Mohave tui chub	FE SE FP G4T1 S1	Formerly found in deep pools and slough-like area of the Mojave River, this species now only occurs in highly modified refuge sites in San Bernardino County.	No	Not Expected. There is no suitable habitat within the survey area to support this species. The only known occurrence of this species was from a 1976 transplant experiment at the South Coast Botanical Gardens.
<i>Sorex ornatus salicornicus</i> southern California saltmarsh shrew	SSC G5T1 S1	Found in coastal salt marshes in Ventura, Los Angeles, and Orange counties, as far south as Anaheim and Newport bays. Generally associated with pickleweed (<i>Salicornia</i> spp.) marshes, has also been known to occur with dense willow (<i>Salix</i> spp.) and bulrush (<i>Scirpus</i> spp.) thickets within the northern portions of its range. Found at elevations at or near sea level.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Spea hammondi</i> western spadefoot	SSC G2G3 S3	Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Rain pools which do not contain American bullfrogs (<i>Lithobates catesbeianus</i>), predatory fish, or crayfish are necessary for breeding. Estivates in upland habitats adjacent to potential breeding sites in burrows approximating 3 feet in depth.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Sterna antillarum browni</i> California least tern	FE SE FP G4T2T3Q S2	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates, including sand beaches, alkali flats, landfills, or paved areas. Prefers broad, level expanses of open sandy or gravelly beach, dredge spoil, and other open shoreline areas, and broad river valley sandbars.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Streptocephalus woottoni</i> Riverside fairy shrimp	FE G1G2 S2	Restricted to deep seasonal vernal pools, vernal pool like ephemeral ponds, and stock ponds and other human modified depressions. Basins that support Riverside fairy shrimp are typically dry a portion of the year, but usually are filled by late fall, winter, or spring rains, and may persist through May. Endemic to western Riverside, Orange, and San Diego Counties in tectonic swales/earth slump basins in grassland and coastal sage scrub. In Riverside County, the species been found in pools formed over the following soils: Murrieta stony clay loams, Las Posas series, Wyman clay loam, and Willows soils. All known habitat lies within annual grasslands, which may be interspersed through chaparral or coastal sage scrub vegetation.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Taxidea taxus</i> American badger	SSC G5 S3	Open habitats with friable soil such as grasslands, brushlands with sparse ground cover, open chaparral, and sometimes riparian zones.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Vireo bellii pusillus</i> least Bell's vireo	FE SE G5T2 S2	Summer resident in southern California. Breeding habitat generally consists of dense, low, shrubby vegetation in riparian areas, and mesquite brushlands, often near water in arid regions. Early successional cottonwood-willow riparian groves are preferred for nesting. The most critical structural component of nesting habitat in California is a dense shrub layer that is 2 to 10 feet (0.6 to 3.0 meters) above ground. The presence of water, including ponded surface water or moist soil conditions, may also be a key component for nesting habitat.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
SPECIAL-STATUS PLANT SPECIES				
<i>Abronia maritima</i> red sand-verbena	4.2 G4 S3?	Perennial herb. Occurs within coastal dunes. Found at elevations ranging from 0 to 328 feet amsl. Blooming period is from February through December.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Aphanisma blitoides</i> aphanisma	1B.2 G3G4 S2	Annual herb. Blooms March through June. Found in coastal scrub and dunes along bluffs and slopes near the ocean in sandy or clay soils. Known elevations range from 0 to 560 feet amsl.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i> Venture Marsh milk-vetch	FE SE 1B.1 G2T1 S1	Perennial herb. Occurs in coastal dunes, coastal scrub, and the edges of marshes and swamps. Found at elevations ranging from 5 to 115 feet amsl. Blooming period is October through July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milk-vetch	FE SE 1B.1 G2T1 S1	Annual herb. Occurs within sandy depressions of bluffs or dunes along and near the Pacific Ocean. Known elevations range from 3 to 150 feet amsl. Blooming period is March through May.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Atriplex coulteri</i> Coulter's saltbush.	1B.2 G3 S1S2	Perennial herb. Generally associated with alkaline or clay soils that occur in grasslands and coastal bluff habitats. Found at elevations ranging from 30 to 1,440 feet amsl. Blooming period is from March through October.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Atriplex pacifica</i> south coast saltscale	1B.2 G4 S2	Annual herb. Occurs on alkaline soils in coastal scrub, coastal bluff, and playas. Found at elevations ranging from 3 to 1,640 feet amsl. Blooming period is from March through October.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Atriplex parishii</i> Parish's brittle-scale	1B.1 G1G2 S1	Annual herb. Occurs in chenopod scrub, playas, and vernal pools. Found at elevations ranging from 80 to 6235 feet amsl. Blooming period is from June through October.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Atriplex serenana</i> var. <i> davidsonii</i> Davidson's saltscale	1B.2 G5T1 S1	Annual herb. Occurs on alkaline soils in coastal bluff scrub and coastal scrub. Found at elevations ranging from 35 to 655 feet amsl. Blooming period is from April through October.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Calochortus catalinae</i> Catalina mariposa lily	4.2 G4 S4	Perennial bulbiferous herb. Occurs in chaparral, cismontane woodland, coastal scrub, and valley and foothill grasslands. Found at elevations ranging from 50 to 2295 feet amsl. Blooming period is from March through June, and occasionally as early as late February.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Calystegia peirsonii</i> Peirson's morning-glory	4.2 G4 S4	Perennial rhizomatous herb. Occurs in chaparral, chenopod scrub, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley and foothill grasslands. Found at elevations ranging from 100 to 4920 feet amsl. Blooming period is from April through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Camissoniopsis lewisii</i> Lewis's evening-primrose	3 G4 S4	Annual herb. Occurs in coastal bluff scrub, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grasslands. Found at elevations ranging from 0 to 985 feet amsl. Blooming period is from March through May.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Centromadia parryi ssp. australis</i> southern tarplant	1B.1 G3T2 S2	Annual herb. Occurs along the margins of marshes and swamps, within valley and foothill grasslands, and vernal pools. Found at elevations ranging from 0 to 1575 feet amsl. Blooming period is from May through November.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Centromadia pungens ssp. laevis</i> smooth tarplant	1B.1 G3G4T2 S2	Annual herb. Occurs in alkaline soils within chenopod scrub, meadows and seeps, playas, riparian woodland, and valley and foothill grassland habitats. Found at elevations ranging 0 to 2,100 feet amsl. Blooming period is from April through September.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Chaenactis glabriuscula var. orcuttiana</i> Orcutt's pincushion	1B.1 G5T1T2 S1	Annual herb. Occurs on coastal bluff scrub (sandy) and coastal dunes. Found at elevations ranging from 0 to 328 feet amsl. Blooming period is from January through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Chenopodium littoreum</i> coastal goosefoot	1B.2 G1 S1	Annual herb. Occurs in coastal dunes. Found at elevations ranging from 35 to 100 feet amsl. Blooming period is from April through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Chloropyron maritimum ssp. maritimum</i> salt marsh bird's-beak	FE SE 1B.2 G4T1 S1	Hemiparasitic annual herb. Occurs in coastal dunes and coastal salt marshes and swamps. Found at elevations ranging from 0 to 100 feet amsl. Blooming period is from May through October, occasionally into November.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Chorizanthe parryi var. fernandina</i> San Fernando Valley spineflower	SE 1B.1 G2T1 S1	Annual herb. Occurs in sandy coastal scrub and valley and foothill grasslands. Found at elevations ranging from 490 to 4005 feet amsl. Blooming period is from April through July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Cistanthe maritima</i> seaside cistanthe	4.2 G3G4 S3	Annual herb. Blooms March through June. Occurs in sandy sites within coastal bluff scrub, coastal scrub, and valley and foothill grassland. Known elevations range from 50 to 590 feet amsl.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Convolvulus simulans</i> small-flowered morning-glory	4.2 G4 S4	Annual herb. Found on wet clay and serpentine ridges within chaparral, coastal scrub, and valley and foothill grassland. Found at elevations ranging from 100 to 2,820 feet amsl. Blooming period is from March to July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Deinandra paniculata</i> paniculate tarplant	4.2 G4 S4	Annual herb. Occurs usually in vernal mesic or sometimes sandy soils within coastal scrub, valley and foothill grassland, and vernal pool habitats. Found at elevations ranging from 80 to 3,085 feet amsl. Blooming period is (March) April through November.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Dichondra occidentalis</i> western dichondra	4.2 G3G4 S3S4	Perennial rhizomatous herb. Occurs on sandy loam, clay, and rocky soils in chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland. Found at elevations ranging from 130 to 1640 feet amsl. Blooming period is from March through July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Dithyrea maritima</i> beach spectaclepod	ST 1B.1 G1 S1	Perennial herb. Occurs coastal and on dunes within coastal strand, and coastal sage scrub habitats. Found at elevations ranging from 0 to 150 feet amsl. Blooming period is from March through May.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Dudleya virens ssp. insularis</i> island green dudleya	1B.2 G3T3 S3	Perennial herb. Occurs on rocky soils within coastal bluff scrub and coastal scrub habitats. Found at elevations ranging from 15 to 985 feet amsl. Blooming period is from April through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery	FE SE 1B.1 G5T1 S1	Annual/perennial herb. Found on mesic soils within coastal scrub, valley and foothill grassland, and vernal pool habitats. Found at elevations ranging from 66 to 2,034 feet amsl. Blooming period is from April through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Erysimum insulare</i> island wallflower	1B.3 G3 S3	Perennial herb. Found in coastal bluff scrub and coastal dune habitats. Found at elevations ranging from 0 to 985 feet amsl. Blooming period is March through July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Erysimum suffrutescens</i> suffrutescent wallflower	4.2 G3 S3	Perennial herb. Found in coastal bluff scrub, maritime chaparral, coastal dunes, and coastal scrub. Found at elevations ranging from 0 to 490 feet amsl. Blooming period is January through July and occasionally into August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Hordeum intercedens</i> vernal barley	3.2 G3G4 S3S4	Annual herb. Habitat includes coastal dunes, coastal scrub, vernal pools, and valley/foothill grassland. Found at elevations ranging from 16 to 3,281 feet amsl. Blooming period is from March through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	1B.1 G4T1 S1	Perennial herb. Habitat includes gravelly and sandy soils within maritime chaparral, cismontane woodland, and coastal scrub. Found at elevations ranging from 230 to 2660 feet amsl. Blooming period is February through March, June, and occasionally September.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	1B.2 G3G5T2T3 S2	Perennial shrub. Found on sandy soils within coastal scrub and chaparral, as well as disturbed sites. Found at elevations ranging from 65 to 1640 feet amsl. Blooming period is from April through November. Blooming period is from April through November.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Juglans californica</i> Southern California black walnut	4.2 G4 S4	Perennial deciduous tree. Found on alluvial soils within chaparral, cismontane woodland, coastal scrub, and riparian woodland. Found at elevations ranging from 165 to 2955 feet amsl. Blooming period is from March through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	1B.1 G4T2 S2	Annual herb. Prefers playas, vernal pools, and coastal salt marshes and swamps. Found at elevations ranging from 3 to 4,003 feet amsl. Blooming period is February through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Lycium brevipes</i> var. <i>hassei</i> Santa Catalina Island desert-thorn	3.1 G5T1Q S1	Perennial deciduous shrub. Found in coastal bluff scrub and coastal scrub. Found at elevations ranging from 215 to 985 feet amsl. Blooming period is June and occasionally August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Lycium californicum</i> California box-thorn	4.2 G4 S4	Perennial shrub. Blooms March through August. Found within coastal bluff scrub and coastal scrub. Known elevations range from 0 to 525 feet amsl. Blooming period is (December) March, June, July, and August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Nama stenocarpa</i> mud nama	2B.2 G4G5 S1S2	Annual/perennial herb. Occurs in marsh and swamp habitats near lake margins and riverbanks. Found at elevations ranging from 15 to 1,640 feet amsl. Blooming period is January through July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Navarretia fossalis</i> spreading navarretia	FT 1B.1 G2 S2	Annual herb. Habitats include chenopod scrub, marshes and swamps (assorted shallow freshwater), playas, and vernal pools. Grows in elevation ranging from 98 to 2,149 feet amsl. Blooming period is April through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Navarretia prostrata</i> prostrate vernal pool navarretia	1B.2 G2 S2	Annual herb. Found in mesic microhabitats within coastal scrub, meadows and seeps, alkaline soils within valley and foothill grasslands, and vernal pools. Found at elevations ranging from 10 to 3970 feet amsl. Blooming period is April through July.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Orcuttia californica</i> California Orcutt grass	FE SE 1B.1 G1 S1	Annual herb. Found in vernal pool habitats. Known elevation ranges from 20 to 2165 feet. Blooming period is April through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Pentachaeta lyonii</i> Lyon's pentachaeta	FE SE 1B.1 G1 S1	Annual herb. Found on clay and rocky soils within the openings of chaparral, coastal scrub, and valley and foothill grasslands. Found at elevations ranging from 100 to 2265 feet amsl. Blooming period is occasionally February, and generally March through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Phacelia ramosissima</i> var. <i>austrolitoralis</i> south coast branching phacelia	3.2 G5?T3Q S3	Perennial herb. Known habitats include sandy and occasionally rocky soils within chaparral, coastal dunes, coastal scrub, and coastal salt marshes and swamps. Known elevations range from 15 to 985 feet amsl. Blooming period is March through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<i>Phacelia stellaris</i> Brand's star phacelia	1B.1 G1 S1	Annual herb. Found in coastal dunes and coastal scrub habitats. Found at elevations ranging from 3 to 1,312 feet amsl. Blooming period is March through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Potentilla multijuga</i> Ballona cinquefoil	1A GX SX	Perennial herb. Known to occur in brackish meadows and seeps. Found at elevations ranging from 0 to 5 feet amsl. Blooming period is June through August.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Sidalcea neomexicana</i> salt spring checkerbloom	2B.2 G4 S2	Perennial herb. Found on alkaline and mesic soils within chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playas. Found at elevations ranging from 49 to 5,020 feet amsl. Blooming period is March through June.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Suaeda esteroa</i> estuary seablite	1B.2 G3 S2	Perennial herb. Found on clay, silt, and sand substrates in coastal salt marshes and swamps. Known elevations range from 0 to 395 feet amsl. Blooms June through October (sometimes May through January).	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Suaeda taxifolia</i> woolly seablite	4.2 G4 S4	Perennial evergreen shrub. Found in coastal bluff scrub, coastal dunes, and the coastal margins of marshes and swamps. Known elevation ranges from 0 to 165 feet amsl. Blooming period is January through December.	No	Not Expected. There is no suitable habitat within the survey area to support this species.
<i>Symphyotrichum defoliatum</i> San Bernardino aster	1B.2 G2 S2	Perennial rhizomatous herb. Known to occur near ditches, streams, and springs within cismontane woodland, coastal scrub, lower montane coniferous forest, meadows and seeps, marshes and swamps, and vernal mesic valley and foothill grasslands. Found at elevations ranging from 5 to 6695 feet amsl. Blooming period is July through November.	No	Not Expected. There is no suitable habitat within the survey area to support this species.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<p>CNDDB/Holland (1986) Southern Coastal Bluff Scrub</p> <p>MCV (1995) California buckwheat series</p> <p>NVCS (2009) Eriogonum fasciculatum shrubland Alliance</p>	G5 S5	Occurs at elevations ranging from 0 to 3600 feet in elevation amsl on upland slopes, intermittently flooded arroyos, channels and washes; rarely flooded low-gradient deposits. Soils are coarse, well drained, and moderately acidic to slightly saline. Dominant species include California sagebrush (<i>Artemisia californica</i>), Purple sage (<i>Salvia leucophylla</i>), Giant coreopsis (<i>Coreopsis gigantea</i>), Island tarplant (<i>Deinandra clementina</i>), St. Catherine's lace (<i>Eriogonum giganteum</i>), Greene's live forever (<i>Dudleya greenei</i>), Bush sunflower (<i>Encelia californica</i>), Coastal buckwheat (<i>Eriogonum cinereum</i>), Island buckwheat (<i>Eriogonum arborescens</i>), Island buckwheat (<i>Eriogonum grande</i>), California buckwheat (<i>Eriogonum fasciculatum</i>), Saw toothed goldenbush (<i>Hazardia squarrosa</i>), Menzies's goldenbush (<i>Isocoma menziesii</i>), California boxthorn (<i>Lycium californicum</i>), Prickly pear (<i>Opuntia littoralis</i>), Chaparral prickly pear (<i>Opuntia oricola</i>), Coastal cholla (<i>Cylindropuntia prolifera</i>), and Black sage (<i>Salvia mellifera</i>). Found at localized sites along the coast, south of Point Conception as well as several sites on the off-shore islands.	No	Absent: This vegetation community does not occur within the project site.
<p>CNDDB/Holland (1986) Southern Coastal Salt Marsh</p> <p>MCV (1995) Cordgrass Series</p> <p>NVCS (2009) <i>Spartina foliosa</i> Herbaceous Alliance</p>	G2 S2.1	Occurs at elevations ranging from 0 to 3 feet amsl on mudflats, banks, berms, and margins of bays and deltas. Plant community with long growing season and great abundance of suffrutescent species in the higher, drier sites. Dominant species include California cord grass (<i>Spartina foliosa</i>), pineapple weed (<i>Amblyopappus pusillus</i>), Watson's saltbush (<i>Atriplex watsonii</i>), beachwort (<i>Batis maritima</i>), alkaliweed (<i>Cressa truxiliensis</i>), salt marsh dodder (<i>Cuscuta salina</i>), seashore saltgrass (<i>Distichlis spicata</i> var. <i>spicata</i>), alkali heath (<i>Frankenia grandifolia</i>), salt heliotrope (<i>Heliotropium curassavicum</i>), marsh jaumea (<i>Jaumea carnosa</i>), wire grass (<i>Juncus acutus sphaerocarpus</i>), and California seablite (<i>Suaeda californica</i>). Typical distribution includes bays, lagoons, and estuaries along the coast.	No	Absent: This vegetation community does not occur within the project site.

Table D-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
<u>CNDDDB/Holland (1986)</u> Southern Dune Scrub <u>MCV (1995)</u> Dune lupine-goldenbush series <u>NVCS (2009)</u> Isocoma menziesii-Lupinus chamissonis-Ericameria ericoides shrubland alliance	G3 S3	Occurs at elevations ranging from 0 to 98 feet amsl on stabilized dunes of coastal bars, river mouths, spits along coastlines, coastal bluffs, and terraces. Dominant species include Mock heather (Ericameria ericoides), Beach blue lupine (Lupinus chamissonis), California sagebrush (Artemisia californica), Beach sagewort (Artemisia pycnocephala), Desert tea (Ephedra californica), Menzies's goldenbush (Isocoma menziesii), Coastal bush lupine (Lupinus arboreus), Prickly pear (Opuntia littoralis), Lemonade berry (Rhus integrifolia), Poison oak (Toxicodendron diversilobum). Typical distribution includes El Segundo Dunes, and a few small examples in Baja California and the Channel Islands.	No	Absent: This vegetation community does not occur within the project site.

* **U.S. Fish and Wildlife Service (USFWS)**

- FE Endangered – any species which is in danger of extinction throughout all or a significant portion of its range.
- FT Threatened – any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.
- FC Candidate – any species which has been designated a candidate for listing under the Federal Endangered Species Act throughout all or a significant portion of its range.

California Department of Fish and Wildlife (CDFW)

- SE Endangered – any native species or subspecies of bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.
- ST Threatened – any native species or subspecies of bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required under the California Endangered Species Act.
- FP Fully Protected – any native species or subspecies of bird, mammal, fish, amphibian, or reptile that were determined by the State of California to be rare or face possible extinction.
- SSC Species of Special Concern – any species, subspecies, or distinct population of fish, amphibian, reptile, bird, or mammal native to California that currently satisfies one or more of the following criteria:
 - is extirpated from California or, in the case of birds, in its primary seasonal or breeding role;
 - is listed as Federally-, but not State-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed.
 - is experiencing, or formerly experienced, serious (nonscyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; or
 - has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status.
- WL Watch List - taxa that were previously designated as “Species of Special Concern” but no longer merit that status, or which do not yet meet SSC criteria, but for which there is concern and a need for additional information to clarify status.

California Native Plant Society (CNPS) California Rare Plant Rank

- 1B Plants rare, threatened, or endangered in California and elsewhere.
- 2B Plants rare, threatened, or endangered in California but more common elsewhere.
- 3 Plants about which more information is needed, a review list.
- 4 Plants of limited distribution – Watch List.

Threat Ranks

- .1 Seriously threatened in California (over 80% of occurrences threatened/high degree any immediacy of threat).

- .2 Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat).
- .3 Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).

NatureServe Conservation Status Rank

The Global Rank (G#) reflects the overall condition and imperilment of a species throughout its global range. The Intraspecific Taxon Rank (T#) reflects the global situation of just the subspecies or variety. The State Rank (S#) reflects the condition and imperilment of an element throughout its range within California. (G#Q) reflects that the element is very rare but there are taxonomic questions associated with it; the calculated G rank is qualified by adding a Q after the G#. Adding a ? to a rank expresses uncertainty about the rank.

- G1/T1 Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
- G2/T2 Imperiled— At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
- G3/T3 Vulnerable— At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
- G4/T4 Apparently Secure— Uncommon but not rare; some cause for long-term concern due to declines or other factors.
- G5 Secure – Common; widespread and abundant.
- S1 Critically Imperiled – Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the State.
- S2 Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or State.
- S3 Vulnerable – Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.
- S4 Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.

Attachment E

Results of an El Segundo Blue Butterfly Habitat Assessment for the Scattergood Generating Station Units 1 and 2 Green-Hydrogen Ready Modernization Project

May 2, 2023

Jazmin Martin
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

RE: RESULTS OF AN EL SEGUNDO BLUE BUTTERFLY HABITAT ASSESSMENT FOR THE SCATTERGOOD GENERATING STATION UNITS 1 AND 2 GREEN HYDROGEN-READY MODERNIZATION PROJECT, LOCATED IN THE CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

Dear Ms. Martin:

A habitat assessment for the federally-listed endangered El Segundo blue butterfly (ESB, *Euphilotes battoides allyni*) was conducted by a permitted ESB biologist, at the request of the Los Angeles Department of Water and Power within the Scattergood Generating Station (Scattergood) in the City of Los Angeles, Los Angeles County, California.

Scattergood is bordered to the south by the Chevron El Segundo Refinery. Approximately 2 acres of the Chevron El Segundo Refinery, located adjacent to the southeast corner of the southern parcel of Scattergood, is a proposed ESB habitat preserve. There is an additional 302 acre habitat preserve, of which 200 acres is considered occupied by the ESB, within the dune habitat owned by Los Angeles International Airport located east of Vista Del Mar and west of Pershing Drive approximately 0.8 miles north of Scattergood. Due to the close proximity of these two known ESB populations, a habitat assessment was required for the Scattergood Generating Station Units 1 and 2 Green Hydrogen Ready Modernization Project (proposed project) to determine if the proposed project would impact any ESB or their habitat.

EL SEGUNDO BLUE BUTTERFLY LIFE HISTORY AND HABITAT

The ESB spends virtually its entire life cycle in intimate association with the flower heads of one particular native plant found along coastal dunes, the seacliff or coast buckwheat (*Eriogonum parviflorum*). The ESB emerges during early summer when the flowers of its host plant open. The adult life of these butterflies is relatively short, lasting only a few days during which they feed, mate, and lay eggs on the coast buckwheat. The eggs hatch within approximately a week of their deposition. The larvae feed on the flower heads of the coast buckwheat for approximately one month. They then crawl to the sand at the base of the buckwheat plant and molt to their pupal stage. Approximately ten months later a new generation of adult butterflies emerge.

Due to this close association of the ESB with the coast buckwheat, the findings of the habitat assessment are based solely on the presence or absence of the coast buckwheat on the project site.

EL SEGUNDO BLUE BUTTERFLY HABITAT ASSESSMENT

A pedestrian survey of Scattergood was conducted by a permitted ESB biologist, Kelly Rios (permit # TE-0108909-6). The habitat assessment was conducted on December 12, 2022, at approximately 10:00 a.m. with overcast skies and an average temperature of 50 degrees. No observations of ESB were expected to occur since the habitat assessment was conducted outside the ESB's flight season.

The survey area within Scattergood consisted of any open space, non-developed area containing vegetation, primarily located along the perimeter of the northern parcel of Scattergood, and along Grand Avenue of the southern parcel of Scattergood. The survey consisted of looking for the ESB's host plant, coast buckwheat, in all open space areas. The survey began near the entrance to Scattergood located off West Grand Avenue. The southern boundary of the northern parcel of Scattergood was surveyed for the presence of any coast buckwheat. The survey continued to the eastern boundary and the open space surrounding three aboveground tanks along the upper terrace of Scattergood. The survey continued to the open space on the east and west side of the central access road within Scattergood. A surrounding area was viewed from the public right-of-way. Note that observations of the southern parcel of Scattergood occurred from the project site boundary with binoculars on December 13, 2022.

FINDINGS

No coast buckwheat (i.e., ESB habitat) was observed at any location in the northern parcel of Scattergood. The vegetation community consisted primarily of non-native species such as hottentot fig (*Carpobrotus edulis*), acacia (*Acacia sp.*), riggut brome (*Bromus rigidus*), slender oats (*Avena barbata*), red-stemmed filaree (*Erodium cicutarium*), and other non-native grasses. A few commonly occurring native plants were found interspersed with the non-natives and include telegraph weed (*Heterotheca grandiflora*) and deerweed (*Acmispon glaber*).

The southern parcel of Scattergood, located south of West Grand Avenue and directly west of the Chevron El Segundo Refinery proposed ESB habitat preserve, consisted of fill dirt stockpiles located at the top of the slope. Many non-native species were observed germinating on these piles and included non-native grasses, as well as a few acacia. The hillside consisted of hottentot fig and scattered acacia. Ornamental trees were observed along the sidewalk between West Grand Avenue and toe of the slope.

No coast buckwheat plants were observed within either the northern or southern parcels of Scattergood.

CONCLUSION

Open space areas within Scattergood were surveyed for the presence of suitable habitat for ESB, specifically for the coast buckwheat. None of the open space areas contain any habitat that would be considered suitable for the ESB. Sandy soils were present onsite; however, no coast buckwheat, the ESB host plant, was observed within the survey area. Although the Chevron El Segundo Refinery proposed habitat preserve is adjacent to Scattergood, there are no coast buckwheat within the survey area. No project facilities are proposed in areas of Scattergood adjacent to the proposed ESB preserve. Additionally, it is not likely that the ESB will fly through the fence into Scattergood due to the natural barrier that the acacia presents and the lack of host plants in the area. The plant species observed within the survey area consists mainly of ruderal species that commonly occur in a non-native grassland plant community or disturbed habitat. Therefore, no ESB or suitable habitat would be impacted by the proposed project and no further surveys or focused surveys for ESB are recommended.

If you have any questions or concerns regarding these findings, please feel free to contact Kathalyn Tung, Kathalyn.tung@mbakerintl.com or (213) 372-1014.

Sincerely,

A handwritten signature in black ink that reads "Kelly Riordan". The signature is written in a cursive style with a large, stylized "R" and "D".

Biologist, 018909-06

Attachment F

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Appendix B

Cultural and Paleontological Resources Identification Report

May 3, 2023

Jazmin Martin
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

RE: CULTURAL AND PALEONTOLOGICAL RESOURCES IDENTIFICATION REPORT FOR THE SCATTERGOOD GENERATING STATION UNITS 1 AND 2 GREEN HYDROGEN-READY MODERNIZATION PROJECT, LOS ANGELES, CALIFORNIA

Dear Ms. Martin:

The Los Angeles Department of Water and Power (LADWP) has proposed the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (project). The project proposes to construct and operate a rapid-response combined-cycle generation system (CCGS) at Scattergood Generating Station (Scattergood). In support of the project, Michael Baker International, Inc. (Michael Baker) completed a South Central Coastal Information Center (SCCIC) records search; a literature, aerial photograph, and historical map review; and archaeological sensitivity assessment. These efforts were completed to determine whether the project could result in significant impacts to historical resources as described by Section 15064.5(b) of the California Environmental Quality Act (CEQA) Guidelines. In addition, Michael Baker conducted archival research, including a records search at the Natural History Museum of Los Angeles County (NHMLAC), in order to determine whether the project could result in significant impacts to paleontological resources. Methods, results, and recommendations are summarized below.

PROJECT DESCRIPTION

The project proposes to construct and operate a rapid-response CCGS at Scattergood. Scattergood is located in the Playa del Rey community of the City of Los Angeles at the intersection of Vista Del Mar and Grand Avenue. Grand Avenue, an east-west thoroughfare, divides the Scattergood property into northern and southern parcels. The CCGS would be located in the southwest corner of the station on an approximately 3-acre site previously occupied by Scattergood Generation Unit 3, which was demolished in 2017-2018. The floor of this area, which has been paved, lies approximately 30 feet below the surrounding grade, creating a basin. In addition, the eastern portion of the southern parcel (south of Grand Avenue) would serve as a materials laydown and employee parking area for the proposed project construction. The project site is surrounded by Dockweiler State Beach to the west, Hyperion Water Reclamation Plant to the north, residential uses to the northeast and east, and the Chevron El Segundo Refinery to the north and south.

PROJECT SITE

The project site for the undertaking is identified as the southern portion of Assessor Parcel Number (APN) 4131-028-900 and all of APNs 4131-027-901 and 4131-027-900, as this includes the maximum extent of ground disturbance associated with the development of the project (see **Attachment 1**). A vertical area of disturbance of approximately 10 feet below the ground surface was generally assumed for excavation related to foundation construction; however, deeper excavation may occur related to drilling for piles for the CCGS. The project site is located in an urban site surrounded by existing development of a similar size and scale.

GEOLOGIC SETTING

California is divided into 11 geomorphic provinces, each defined by unique geologic and geomorphic characteristics. The project site is in the northwest portion of the Peninsular Ranges geomorphic province, which is marked by northwest-trending mountain ranges and valleys subparallel to the San Andreas Fault. This geomorphic province also includes physiogeographic features such as the Los Angeles Basin, the southern members of the Channel Islands, and the continental shelf (CGS 2002). The Peninsular Ranges province crosses several counties, as well as Baja California, and is bound by the Pacific Ocean to the west, the Transverse Ranges geomorphic province to the north, and the Colorado Desert geomorphic province to the east. The Peninsular Ranges are dominated by the Peninsular Ranges batholith (Prothero 2017).

The project site is within the Los Angeles Plain ecoregion of California (Griffith et al. 2016). Ecoregions denote general similarity in ecosystems and environmental resources. This region consists of gently sloping alluvial fans (including the San Fernando and San Gabriel Valleys) and nearly level floodplains. Climate in this region is influenced by the Pacific Ocean with thermic soil temperatures and xeric soil moisture. Although much of this ecoregion has been modified by urban and residential development, vegetation in undisturbed areas include California sagebrush, California buckwheat, coast live oak, chamise chaparral, and annual grasslands.

The soil in the project site has been mapped as Urban land. Urban land found on soil maps indicates an area is predominantly covered by urban development features, such as streets, parking lots, buildings, and other structures (NRCS 2022).

NATURAL VEGETATION COMMUNITIES

Based on the Biological Resources Assessment conducted for the proposed project, no natural vegetation communities were observed within the Scattergood property. The entire property has been constructed upon or physically altered to a degree that natural soil substrates and native vegetation communities are no longer supported. Non-native ornamental vegetation occurs in areas that are not developed, with occasional native species. Non-native species observed include acacia (*Acacia* sp.), Mexican fan palm (*Washingtonia robusta*), and eucalyptus (*Eucalyptus* sp.) trees, with hottentot fig (*Carpobrotus edulis*), ripgut brome (*Bromus rigidus*), slender oats (*Avena barbata*), red-stemmed filaree (*Erodium cicutarium*), and other non-native grasses observed as ground cover. Native plants species that were observed include telegraph weed (*Heterotheca grandiflora*) and deerweed (*Acmispon glaber*).

CULTURAL RESOURCES IDENTIFICATION METHODS

The results of the SCCIC records search, archival research, literature, historical map, and aerial photograph review, and archaeological site sensitivity analysis are presented below.

SOUTH CENTRAL COASTAL INFORMATION CENTER

On November 9, 2022, Michael Baker Senior Archaeologist Marc Beherec, PhD, RPA, conducted a records search at the SCCIC (**Attachment 2**). The records search included the Scattergood and a half-mile radius. The SCCIC is a part of the California Historical Resources Information System, housed at California State University, Fullerton, an affiliate of the California Office of Historic Preservation (OHP) and the State Historical Resources Commission, and is the official state repository of cultural resources records and reports for Los Angeles, Ventura, San Bernardino, and Orange Counties. Michael Baker supplemented this search with available online databases maintained by federal and state repositories. As part of the records search, the following federal and California inventories were reviewed:

- National Register of Historic Places (NRHP) (National Park Service 2022)
- Archaeological Resources Directory for Los Angeles County (OHP 2022a). The directory includes the OHP determinations of eligibility for archaeological resources in Los Angeles County.
- Built Environment Resource Directory for Los Angeles County (OHP 2022b). The directory includes resources reviewed for eligibility for the NRHP and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs, including the NRHP, California Register of Historical Resources (CRHR), California Historical Landmarks, and California Points of Historical Interest.
- California Historical Resources (OHP 2022c)

Previous Studies

Three cultural resources studies have been previously completed within Scattergood; an additional 11 have been completed within a half-mile (**Table 1**).

Table 1: Previous Studies within 0.5 Miles of Scattergood

Report #	Author	Date	Title	Within Scattergood?
LA-00125	Leonard, Nelson N. III	1975	Hiperion [sic] Plant	No
LA-02904	Stickel, Gary E.	1993	Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project	Yes
LA-03494	Briuer, Frederick L.	1976	Archaeological Impact Statement Development of the Hyperion Treatment Plant Secondary Treatment Facility W.o. 31225, Located at 12000 Vista Del Mar, Playa Del Rey	No

Cultural and Paleontological Resources Identification Report for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project, Los Angeles, California

Table 1: Previous Studies within 0.5 Miles of Scattergood

Report #	Author	Date	Title	Within Scattergood?
LA-04051	D'Altroy, Terence N.	n.d.	Evaluation of the Potential Impact on Archaeological Resources of the Proposed Hyperion Treatment Plant- Interim Sludge Processing and Disposal System	No
LA-04861	Duke, Curt	2000	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 483-03, in the County of Los Angeles, California	No
LA-04907	Maki, Mary K.	2000	Phase I Archaeological Investigation of Limited Areas Within the Los Angeles Department of Water & Power's Harbor, Scattergood & Valley Generating Stations Los Angeles County, California	Yes
LA-05708	McKenna, Jeanette A.	2002	Review of Cultural Resource Assessment/evaluation for Nextel Communications Site CA-6518-d, Los Angeles, Los Angeles County, California	No
LA-06239	Wesson, Alex, Bryon Bass, and Brian Hatoff	2000	El Segundo Power Redevelopment Project Cultural Resources (archaeological Resources) Appendix J of Application for Certification	No
LA-06240	Bunse, Meta and Stephen D. Mikesell	2000	El Segundo Power Redevelopment Project Historic Resources (built Environment) Appendix K of Application for Certification	No
LA-06243	Duke, Curt	2002	Cultural Resource Assessment at & T Wireless Services Facility No. 05195c Los Angeles County, California	No
LA-07722	Maki, Mary K.	2005	Records Search Results for the Chevron El Segundo Refinery, El Segundo, Los Angeles County	No
LA-10622	White, Laura S.	2009	Cultural Resources Records Search and Site Visit results for T-Mobile USA Facility LA33654C (Richmond Elementary), City of El Segundo, Los Angeles County, California	No
LA-12078	Bonner, Wayne	2012	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Facility LAR013 (LAR013-01 El Segundo/SCE) CASPR No. 3551278803, 301 Vista Del Mar, El Segundo, Los Angeles County, California	No
LA-12500	Vader, Michael	2013	Final Archaeological Resources Monitoring Report for the Los Angeles Department of Water and Power Scattergood-Olympic Transmission Line Project, Vault Investigations, Los Angeles County, California	Yes

In addition to the studies documented at the SCCIC, an additional study is on file with LADWP. The study, *Scattergood Generating Station Unit 3 Repowering Project Cultural Resources Survey Report, City of Los Angeles, Los Angeles County, California*, includes archaeological and built environment surveys of the entire project site (Austerman and Rudolph 2011).

Previously Recorded Resources

One resource, Scattergood itself, is documented within the project site and described below. One additional previously recorded resource, the El Segundo Power Generating Station, is documented within 0.5 miles of the project site, as outlined in Table 2 below.

Scattergood Generating Station

When initially documented in 2011, the resource consisted of four 1959-era structures within the property, including the original structure of Units 1 and 2, a large fuel oil service tank in the center of the property, three water storage tanks at the eastern boundary of the property, and four large storage tanks in the southeast corner of the property across Grand Avenue (Austerman and Marty 2011). Additionally, the generating station consisted of Unit 3, constructed in 1974 and demolished ca. 2017-2018. The surviving additional structures are not historic in age. Scattergood was recommended ineligible for inclusion in the CRHR in 2011. It is not a historical resource as defined by CEQA Section 15064.5(a).

Table 2: Previously Recorded Resources within 0.5 Miles of Scattergood

Resource Name/ Number	Address	Description	OHP Status Code/ Eligibility Status	Relationship to Scattergood
P-19-190098 / El Segundo Power Generating Station	301 Vista Del Mar	Power generating station	6Z Found Ineligible for NRHP, CRHR, or local register through survey evaluation	Outside

LITERATURE, HISTORICAL MAP, AND AERIAL PHOTOGRAPH REVIEW

Michael Baker reviewed literature, maps, and aerial photographs for historical and archaeological information about the project site and the vicinity. Below is a list of resources reviewed, followed by a narrative description of the results for the project site.

- "Gabrielino" (Bean and Smith 1978)
- *The First Angelinos: The Gabrielino Indians of Los Angeles* (McCawley 1996)
- "A Suggested Chronology for Southern California Coastal Archaeology" (Wallace 1955)
- *Development of Underground Waters in the Eastern Coastal Plane Region of California* (Mendenhall 1905)
- *Vineyards and Vaqueros: Indian Labor and the Economic Expansion of Southern California, 1771-1877* (Phillips 2010)
- *Redondo, California, 1:62,500 scale topographic quadrangle* (USGS 1896)
- *Southern California, California, 1:250,000 scale topographic quadrangle* (USGS 1901)
- *Southern California, California, 1:250,000 scale topographic quadrangle* (USGS 1904)
- *Venice, California, 1:24,000 scale topographic quadrangle* (USGS 1923)
- *Venice, California, 1:24,000 scale topographic quadrangle* (USGS 1924)
- *Venice, California, 1:24,000 scale topographic quadrangle* (USGS 1934)
- *San Pedro, California, 1:125,000 scale topographic quadrangle* (USGS 1943)
- *Redondo, California, 1:62,500 scale topographic quadrangle* (USGS 1944)
- *Long Beach, California, 1:250,000 scale topographic quadrangle* (USGS 1949)
- *Venice, California, 1:24,000 scale topographic quadrangle* (USGS 1950)

Cultural and Paleontological Resources Identification Report for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project, Los Angeles, California

- *Long Beach, California*, 1:250,000 scale topographic quadrangle (USGS 1958)
- *Long Beach, California*, 1:250,000 scale topographic quadrangle (USGS 1960)
- *Venice, California*, 1:24,000 scale topographic quadrangle (USGS 1964)
- *Long Beach, California*, 1:100,000 scale topographic quadrangle (USGS 1981)
- *Long Beach, California*, 1:62,500 scale topographic quadrangle (USGS 1989)
- *Venice, California*, 1:24,000 scale topographic quadrangle (USGS 2012)
- *Venice, California*, 1:24,000 scale topographic quadrangle (USGS 2015)
- *Venice, California*, 1:24,000 scale topographic quadrangle (USGS 2018)
- *Venice, California*, 1:24,000 scale topographic quadrangle (USGS 2021)

Results

Traditional models of the prehistory of California hypothesize that its first inhabitants were the big game-hunting Paleoindians who lived at the close of the last Ice Age (approximately 11,000 years before present [BP] through the early Holocene 7,600 BP). As the environment warmed and dried, Ice Age megafauna died out, requiring adaption to coastal resources by groups to survive. The coastal tool manifestation of Paleoindian people is the San Dieguito Complex and within a lifeway known as the Paleocoastal Tradition. Along the coast, rising sea levels created bays and estuaries. Groups adopted marine subsistence, including fish and shellfish. These resulting shell middens contain flaked cobble tools, metates, manos, discoidals, and flexed burials and indicate a semi-sedentary lifestyle (Byrd and Raab 2007).

During the middle Holocene (7,600–3,650 BP), conditions continued to warm and dry. Inhabitants practiced a mixed food procurement strategy with an emphasis on shellfish and hard seeds. This shift in subsistence is what William Wallace named the Millingstone Horizon (Wallace 1955). Characteristics of the middle Holocene sites include ground stone artifacts (manos and metates) used for processing plant material and shellfish, flexed burial beneath rock or milling stone cairns, flaked core or cobble tools, dart points, cogstones, discoidals, and crescentics.

Characteristics of the late Holocene (3,650–233 BP) include the increased dependence on mortar and pestle for food processing, a change to more complex and elaborate mortuary behaviors, and the introduction of the bow and arrow and ceramic technologies toward the end of the late Holocene. Marine resource exploitation proliferated and diversified. The climate fluctuated with periods of drought alternating with cooler and moister periods (Byrd and Raab 2007). These fluctuations resulted in dynamic regional cultural patterns with considerable local variation. Settlement strategies shifted toward permanent settlement during this period.

Ethnohistoric and Early Historic Context

Spanish explorers first visited the coast of southern California in 1542. But European settlement did not begin in the area until 1769, when Gaspar de Portola led an exploratory mission intended to open up Alta California to settlement. On September 8, 1771, Franciscan friars established Mission San Gabriel Arcángel, approximately 22 miles northeast of the project site. The project site was located within the area allotted to Mission San Gabriel, and the Franciscans called the local Native Americans Gabrielinos after the mission. For historical reasons the term Gabrielino is typically used by anthropologists, archaeologists, and historians, and will be used in this memorandum, although today's descendant communities use the Native American terms Tongva or Kizh to describe themselves and their ancestors.

Gabrielino territory included the Los Angeles Basin, parts of the Santa Ana and Santa Monica Mountains, and San Clemente, San Nicolas, and Santa Catalina Islands. The Gabrielino spoke a dialect of the Cupan group of the Takic language family (Bean and Smith 1978: 538-549). Gabrielino villages were most common along the coast and along the region's major rivers, where villages formed of domed semipermanent structures the Spanish likened to half-oranges centered around a temple and the home of the village chief. Closest to the project site, approximately 3.5 miles north along the coast, the area around the mouth of Ballona Creek was densely populated and was the site of the village of Waachgna (also known as Guashna). Approximately 4.8 miles south along the coast was another important Gabrielino place, Onoovanga (also known as Engnovangna), the Place of Salt, which was a salt lake where the Gabrielino collected salt for personal use and trade; this salt lake was later mined commercially during the American period (McCawley 1996). Other villages, the names of which are not recorded, may have also existed in the area. The resource procurement areas of these known and unknown villages likely included the project site. By the early 1800s, as introduced diseases led to population decline, and Spanish use of the land for agriculture and grazing made the Gabrielinos' reliance on their traditional lifestyle increasingly untenable, the majority of California's coastal Native American populations had entered the mission system (Jackson 1999).

In 1821, Mexico won its independence from Spain. The new state was secular in nature and moved increasingly towards secularization of the mission and dispersal of the mission properties among politically connected elites. In 1822, Antonio Ygnacio Avila was granted grazing rights over 22,458 acres, including the project site. In 1837, Mexican Governor Juan Alvarado granted the land, now known as Rancho Sausal Redondo, to Avila. Native Americans continued to live on the land grant and made up much of the rancho's workforce. California's Native Americans sometimes preferred to live as vaqueros and laborers on the region's vast land grants in order to avoid living more directly under the mission system (Phillips 2010). In 1834, the missions were secularized and their lands divided up. Little of the missions' lands and wealth went to the Native Americans. More than 600 ranchos were granted between 1833 and 1846 as the Mexican government sought to solidify its authority over Alta California amid fears of intrusion by the United States.

California was captured by the United States during the Mexican-American War of 1846–1848. The discovery of gold in California led to a population boom in the 1850s and 1860s. The completion of the transcontinental Santa Fe Railroad in 1886 led to increased land speculation and development (Meyer 1981).

Project Site Development History

The project site is located within the boundary of the 1837 Rancho Sausal Redondo land grant. The only development noted on a diseño of the land grant is a corral near Centinela Creek, approximately 3.25 miles from the project site, but these maps were generated to establish land ownership and so generally do not show indigenous villages or other potential impediments to their creators' land cases (United States District Court n.d.). The project site was undeveloped into the twentieth century, and the closest natural source of freshwater is located approximately 3.25 miles north, where Centinela Creek and Ballona Creek meet at an estuary (USGS 1896, 1901, 1904). Over the course of the twentieth century, housing and road development was developed progressively east of the project site, and by 1923 West Grand Avenue was located adjacent to the project site (USGS 1923, 1924, 1934, 1943, 1944, 1949, 1950). In 1958, USGS topographic maps indicate the project site has been fully developed and matches the modern satellite imagery (Google Earth 2002; UCSB 1938, 1960; USGS 1958, 1960, 1964, 1981, 1989, 2012, 2015, 2018, 2021).

Cultural and Paleontological Resources Identification Report for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project, Los Angeles, California

In 1954, LADWP acquired a 54-acre industrial tract located along the coast between the Hyperion Water Reclamation Plant to the north and the Chevron El Segundo Refinery to the south. A steam plant was constructed on this tract and named for Ezra F. Scattergood, the first head of the Los Angeles Bureau of Power and Light, who developed the City of Los Angeles' municipal power system. The first two units were constructed in 1958 and 1959, and a third unit was completed in 1974 (Austerman and Rudolph 2011). Units 4, 5, 6, and 7 were placed into operation in 2015, and Unit 3 was demolished ca. 2017-2018. As a result of the power plant construction, the entire project site is built upon or paved.

FIELD SURVEY

No architectural field survey was conducted to document the current condition of Scattergood. However, elements of the station that are historic in age have been previously evaluated and determined ineligible for inclusion in the CRHR. No further work is recommended for this resource.

The entire project site is built upon, hardscaped, or otherwise disturbed, rendering a potential field survey of limited value. Therefore, no archaeological or paleontological surveys were conducted for the project.

NATIVE AMERICAN CONSULTATION

Native American consultation is being conducted by LADWP and will be documented separately as part of the environmental document.

BURIED ARCHAEOLOGICAL SITE SENSITIVITY ANALYSIS

The project site has very low to no sensitivity for significant prehistoric or historic period archaeological sites due to past impacts from historic and modern construction, road construction, and landscaping. The site was historically occupied by aeolian sand dunes, with the closest source of freshwater approximately 3.25 miles to the north. While resources might be procured in such a location and other tribal villages may have existed in the area, the ethnographic research does not indicate any villages or named places within or near the project site. Additionally, the natural soils in this area would have been impacted by aeolian erosion and deposition mixing events, meaning that preservation of archaeological sites would be reduced. The project area is now located on an artificially flat area composed of fill soils and the project site has been heavily disturbed by the construction of facilities for the Scattergood Generating Station. A 2011 field survey indicated that the thin layer of Holocene deposits were stripped from the project area (Minch 2011). The lack of Holocene deposition at the site and past disturbances indicate that the project site has a very low to no potential to preserve buried deposits. The project area is mapped as Urban land (fill) series sand and beach deposits. Fill soils typically have little to no sensitivity for significant or potentially significant archaeological resources because the soils are not within their primary context. Therefore, due primarily to past construction impacts leading to a lack of native soils, the project area has low sensitivity for buried archaeological resources.

PALEONTOLOGICAL RESOURCES IDENTIFICATION METHODS

PALEONTOLOGICAL RECORDS SEARCHES

Scattergood and the surrounding project area, was previously studied in *Paleontological Resource Technical Report: LADWP Scattergood Generating Station (SGS), Unit 3, Repowering Project, Vista del Mar, City of Los Angeles, California* (Minch 2011). That study, which included archival research and a field survey, failed to identify any resources within the project site; further, the research indicated that Holocene deposits near the surface have been stripped away by past construction activities. However, the field research and archival research indicated that near the present ground surface the project site has a high sensitivity for fossils in Pleistocene deposits that exist beneath recent fill. These Pleistocene deposits potentially include the highly sensitive Palos Verdes Sands and San Pedro Formation.

Michael Baker staff received a paleontology collection records search for locality and specimen data from the NHMLAC on October 30, 2022 (**Attachment 4**). The search showed no previously identified fossil localities within the project area. Six fossil localities from the same sedimentary deposits as the project area occurred, either at the surface or at depth, within 3.75 miles of the project site. Three of these fossil localities occurred between within 1 mile of the project site (**Table 3**).

Table 3: Previously Recorded Paleontological Resources from NHMLA Records Search

Collection Number	Taxa	Formation	Intervals	Distance to Scattergood
LACM IP 34957	Pismo clam (<i>Tivela stultorum</i>) and other invertebrates	Marine Terrace (Late Pleistocene; massive, light brown to reddish-brown sand)	Late Pleistocene	Within 0.6 Miles
LACM VP 34958	Invertebrates (unspecified)	Palos Verdes Sand / San Pedro Formation (well bedded, yellow-tan to green-grey sand)	Pleistocene	Within 0.6 Miles
LACM VP 3264	Elephant clade (<i>Proboscidea</i>)	Unknown formation (Pleistocene sands)	Pleistocene	Within 1 Mile
LACM VP 7332	Mammoth (<i>Mammuthus</i>)	Unknown formation (Pleistocene; silty sand)	Pleistocene	Within 3.25 Miles
LACM VP 4942	Mammoth (<i>Mammuthus</i>); bison (<i>Bison</i>); hare (<i>Lepus</i>)	Unknown formation (Pleistocene, massive sandy mudstone w scattered pieces of gravel)	Pleistocene	Within 3.5 Miles
LACM VP 3789	Mammoth (<i>Mammuthus</i>)	Unknown (Pleistocene; pebbly gray-green to brown mud that directly overlies a gray-green fine sand)	Pleistocene	Within 3.75 Miles

Michael Baker conducted supplemental paleontological records searches within 3 miles of the project site using the following websites:

- University of California Museum of Paleontology Locality Search (UCMP 2022)

Cultural and Paleontological Resources Identification Report for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project, Los Angeles, California

- San Diego Natural History Museum Collection Database (SDNHM 2022)
- The Paleobiology Database (PBDB 2022)
- FAUNMAP (FAUNMAP 2022)

The databases showed no previously identified fossil localities within the project site, and one locality within 3 miles (Table 4).

Table 4: Previously Recorded Paleontological Resources from Online Databases

Collection	Taxa	Formation	Intervals
PBDB	Carnivora – Phocidae Phoca cf. vitulina	Unknown	Late Pleistocene

PALEONTOLOGICAL RESOURCES SENSITIVITY ANALYSIS

The NHMLAC records search results and the previous study of the project site (Minch 2011) indicate that potentially fossil-bearing units are present in the project area, since the same Pleistocene-age deposits outside of the project area, potentially including the highly sensitive Palos Verdes Sands and San Pedro Formation, are known to contain fossils. The disturbed industrial urban soils in the project site have a low sensitivity, but Pleistocene-age alluvial sediments are anticipated to underlie these younger sediments at a relatively shallow depth. The Pleistocene sediments in the project area are considered to have a high sensitivity for paleontological resources.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

CULTURAL RESOURCES RECOMMENDATIONS

The SCCIC records search and literature and map review identified no historical or archaeological resources, as defined by CEQA Section 15064.5(a), in the project site. Additionally, a buried archaeological sensitivity assessment indicates very low to no sensitivity for buried archaeological resources within the project site. The Holocene deposits at the site appear to have been completely stripped away by past construction at the site (Minch 2011). The lack of Holocene deposition at the site and past disturbances indicate that the project site has a very low to no potential to preserve buried deposits.

If human remains are found, those remains require proper treatment in accordance with State of California Health and Safety Code Sections 7050.5-7055. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are discovered during excavation of a site. As required by state law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the “most likely descendant.” If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlie adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains.

PALEONTOLOGICAL RECOMMENDATIONS

Archival research, including a records search at the NHMLAC, and a previous study of the project site indicate that the project site is underlain by Pleistocene deposits at relatively shallow depths. The Pleistocene sediments in the project area are considered to have a high sensitivity for paleontological resources. Impacts to paleontological resources may be avoided through implementation of the following recommendations:

Paleontological Monitoring. Prior to grading or excavation, LADWP shall retain a Society for Vertebrate Paleontology (SVP)-qualified paleontologist to monitor or supervise monitoring of earth-moving activities in sedimentary rock material other than topsoil or fill material. A qualified paleontologist is a professional with a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California, as well as at least one year of full-time professional experience or equivalent specialized training in paleontological research (i.e., the identification of fossil deposits, application of paleontological field and laboratory procedures and techniques, and curation of fossil specimens), and at least four months of supervised field and analytic experience in general North American paleontology (SVP 2010).

Paleontological monitoring is required during ground disturbance in undisturbed geologic contexts (i.e., bedrock and outcrops below existing asphalt and base) which have the potential to contain significant paleontological resources. Ground disturbance refers to activities that impact subsurface geologic deposits, such as grading, excavation, boring, etc. The qualified paleontological monitor shall recommend when monitoring is required. Either geotechnical logs identifying subsurface conditions will be reviewed in order to identify at what depth undisturbed bedrock is to be encountered, or work shall be monitored on a part-time basis until undisturbed sediments are observed, after which the frequency of monitoring will be determined with the input of the qualified paleontological monitor based on the nature and depth of ground-disturbing activities taking place and the sediments encountered. Activities taking place in current topsoil or within previously disturbed fill sediments (e.g., clearing, grubbing, pavement removal or rehabilitation, and demolition and debris removal) do not require paleontological monitoring. Bedrock can occur at varying depths depending on the portion of the project area, and monitoring may be reduced or eliminated based on the recommendations of the qualified paleontologist.

If any paleontological resources are discovered at the project site during ground-disturbance activities at any depth, the paleontological monitor, in discussion with the qualified paleontologist, will notify the on-site construction supervisor, who shall temporarily halt work all such activities within 100 feet of the discovery.

LADWP shall consult with the qualified paleontologist to assess the significance of the find to determine the appropriate treatment. The assessment will follow the SVP's *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* in determining appropriate identification, evaluation, disclosure, avoidance, recovery, and/or curation. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified paleontologist must be followed unless avoidance is determined to be infeasible in relation to the implementation of the proposed project. If

avoidance is infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Appropriate treatment as determined by the qualified paleontologist shall be implemented with respect to the evaluation and recovery of fossils, after which the on-site construction supervisor shall be notified that work may continue in the location of the fossil discovery. Any fossils recovered during mitigation shall be cleaned, identified, catalogued, and permanently curated with an accredited and permanent scientific institution with a research interest in the materials.

If no fossils have been recovered after 50 percent of excavation has been completed, full-time monitoring may be modified to weekly spot-check monitoring at the discretion of the qualified paleontologist. The qualified paleontologist may recommend reduced monitoring based on observations of specific site conditions during initial monitoring (e.g., if the geologic setting precludes the occurrence of fossils).

PREPARER QUALIFICATIONS

This memorandum was prepared by Michael Baker Archaeologist Jacob Parsley, BA, and Senior Archaeologist Marc Beherec, PhD, RPA. The memorandum was reviewed for quality control by Cultural Resources Department Manager Margo Nayyar.

Jacob Parsley, BA, Archaeologist, has worked in various capacities in cultural resources management since 2018. He is experienced in surveying, monitoring, and writing cultural resources constraints reports within the frameworks of Section 106 of the National Historic Preservation Act (NHPA), National Environmental Policy Act (NEPA), and CEQA. He has participated in projects in several phases of archaeology: Phase I pedestrian and shovel test surveys, buried site testing, Phase III data recovery, and Phase IV monitoring. His project highlights include archaeological surveying to update and verify cultural resources found mostly in remote areas of California, many of which have included prehistoric components. Other project responsibilities include identifying and flagging historic and prehistoric resources, delineating best access routes, conducting post-impact assessments, and reporting to the National Park Service, National Forest System, public utilities, and private clients.

Marc A. Beherec, PhD, RPA, Principal Investigator/Senior Archaeologist, has more than 20 years of experience in prehistoric and historical archaeology and cultural resources management. His experience includes writing technical reports, including NEPA, NHPA, and CEQA compliance documents. He has supervised and managed all phases of archaeological fieldwork, including survey, Phase II testing and evaluations and Phase III data recovery, and monitoring at sites throughout Southern California. Dr. Beherec meets the Secretary of the Interior's Professional Qualification Standards for prehistory and historical archaeology.

Margo Nayyar, MA, Department Manager, is a senior architectural historian with 12 years of cultural management experience in California, Nevada, Arizona, Idaho, Texas, and Mississippi. Her experience includes built environment surveys, evaluation of historic-era resources using guidelines outlined in the NRHP and CRHR, and preparation of cultural resources technical studies pursuant to CEQA and Section 106 of the NHPA, including identification studies, finding of effect documents, memorandum of agreements, programmatic agreements, and Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey mitigation documentation. She prepares cultural resources sections for CEQA environmental documents, including infill checklists, initial studies, and environmental impact reports, as well as NEPA environmental documents, including

Cultural and Paleontological Resources Identification Report for the Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project, Los Angeles, California

environmental impact statements and environmental assessments. She also specializes in municipal preservation planning, historic preservation ordinance updates, Native American consultation, and provision of Certified Local Government training to interested local governments. She develops Survey 123 and Esri Collector applications for large-scale historic resources surveys, and authors NRHP nomination packets. Margo meets the Secretary of the Interior's Professional Qualification Standards for history and architectural history.

Sincerely,



Jacob Parsley, BA
Archaeologist



Marc Beherec, PhD, RPA
Senior Archaeologist

Attachments:

Attachment 1 – Figures

Attachment 2 – South Central Coastal Information Center Records Search Results (Confidential)

Attachment 3 – Department of Parks and Recreation 523 Series Forms

Attachment 4 – Natural History Museum of Los Angeles County Records Search Results

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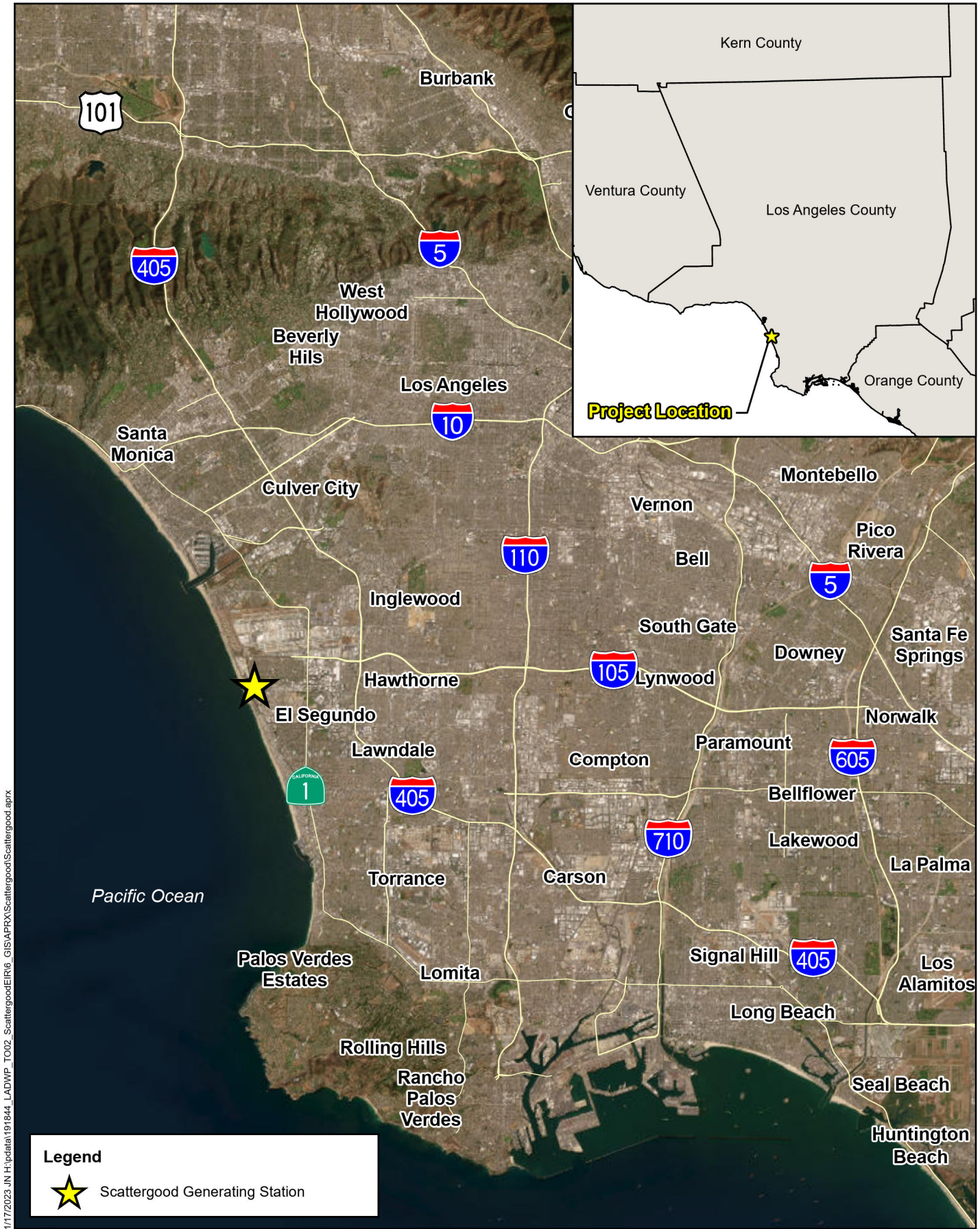
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Attachment 1

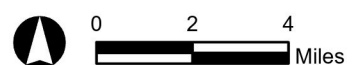
Figures



1/17/2023, JN H:\p\data\191844_LADWP_T002_Scattergood\ER16_GIS\APRX\Scattergood\Scattergood.aprx

Legend

 Scattergood Generating Station



Source: ArcGIS Online, 2018

SCATTERGOOD GENERATING STATION UNITS 1 AND 2
GREEN HYDROGEN-READY MODERNIZATION PROJECT

Regional Location Map

Figure 1

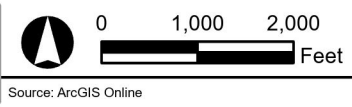


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Legend

Scattergood Generating Station

City Boundary



Attachment 2

South Central Coastal Information Center Records Search Results (Confidential)

Attachment 3
Department of Parks and Recreation
523 Series Forms

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code

Other Listings
Review Code

Reviewer

Date

Page 1 of 7

*Resource Name or #: Scattergood Generating Station

P1. Other Identifier:

*P2. Location: Not for Publication Unrestricted

*a. County: Los Angeles

*b. USGS 7.5' Quad: Venice, CA

Date: 1981 T 3 S ; R 15 W ; unsectioned ; S.B. B.M.

c. Address: 12700 Vista Del Mar City: Los Angeles

Zip: 90293

d. UTM: Zone: 11 ; 368048 mE/3753801 mN (G.P.S.)

e. Other Locational Data:

The Scattergood Generating Station is located in Los Angeles, CA., overlooking the Pacific Ocean and Dockwiller State Beach. From Los Angeles on I-110 S, take exit 14 A to merge onto the I-105 W toward Los Angeles International Airport. Continue on I-105 W for approximately 7 miles. Take exit 1B to merge onto Sepulveda Blvd and proceed for 1.2 miles. Turn right on Grand Ave. and proceed for 2 miles. Turn right onto Vista Del Mar. Elevation: Sea Level

*P3a. **Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
This site is a working power plant which consists of three steam powered generating units, associated out buildings and infrastructure. This plant was named for E. F. Scattergood, known by Los Angeles as 'the Father of Municipal Power', it's construction was part of a long-range program of constructing electrical facilities to address the growing need for power in the city.

Four 1959-era buildings within the property were noted and documented as LADWP Site 1 and associated features. These features are the original structure of the power plant Units 1 and 2 (Feature 1), a large fuel oil service tank in the center of the property (Feature 2), three water storage tanks at the eastern boundary of the project (Feature 3), four large storage tanks in the southeast corner of the property across Grand Avenue (Feature 4). Two smaller structures were noted on the *Venice 7.5* minute topographic quadrangle map, 1964 (p.r. 1981), but were not located during the field survey.

*P3b. **Resource Attributes:** HP 9 Public Utility Building

*P4. **Resources Present:** Building Structure Object Site District Element of District Other (Isolates, etc.)



P5b. Description of Photo:
View of Scattergood Generating Station facing East

*P6. **Date Constructed/Age and Sources:**

Historic
 Prehistoric Both

*P7. **Owner and Address:**

L.A. Dept. of Water and Power
111 North Hope Street
Los Angeles, CA 90012

*P8. **Recorded by:**

Gini Austerman and Johanna Marty
POWER Engineers, Inc.
731 East Ball Road, Ste. 100
Anaheim, CA 92805

*P9. **Date Recorded:** 2/22/11

*P10. **Survey Type:** Pedestrian Survey

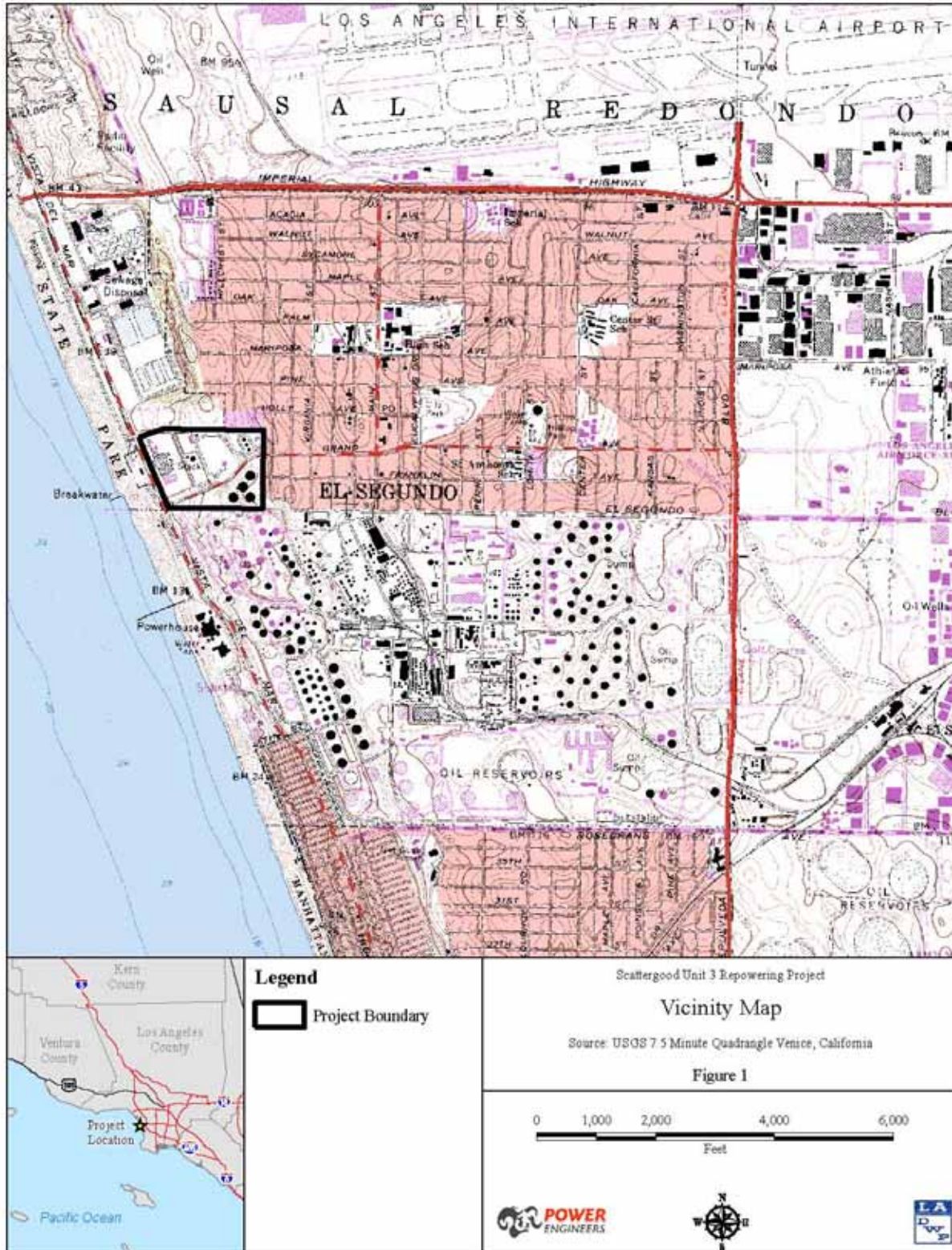
*P11. **Report Citation:** (Cite survey report and other sources, or enter "none.")

Austerman 2011 Scattergood Steam Generating Station Unit 3 Repowering Project Cultural Resource Survey.

*Attachments: NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List):

DPR 523A (1/95)

*Required information



BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name or # Scattergood Generating Station – Feature 1

- B1. Historic Name: Scattergood Generating Station
- B2. Common Name: Scattergood Generating Station
- B3. Original Use: Steam power generation
- B4. Present Use: Power generation

*B5. **Architectural Style:** Industrial

*B6. **Construction History:** (Construction date, alterations, and date of alterations)

Feature 1 consists of the original Scattergood Steam Plant, constructed in 1958 on a 56 acre parcel on the ocean front. To clear the site, a total of 3.5 million cubic feet of sand was removed and relocated to nearby beaches. Construction of this plant, named for E. F. Scattergood who was known by Los Angeles as ‘the Father of Municipal Power’, as part of a long-range program of constructing electrical facilities to address the growing need for power in the city.

The main building for the steam plant is constructed with a steel framework that was 400 feet long by 257 feet wide with a height of over 100 feet. The first two generating units, Units 1 and 2, including turbine-generators, boilers, condensers and other related equipment, each had a capacity of 156, 000 kilowatts. They were placed into operation in 1958 and 1959, respectively (Intake 1957). Unit 3 was constructed and placed into operation in 1974.

Unit 1 and 2 generator units are located on the lowest terrace, adjacent to the Vista Del Mar, they utilize a common exhaust stack which is approximately 300 feet in height. The great turbine-generator units are housed in enclosures that are approximately 150 feet in height. They are driven by steam generated in boiler structures that are 133 feet high and enclose a furnace volume of approximately seven medium-sized houses. Cooling water, used to convert exhaust steam, is drawn from the ocean through tunnels and discharged back again, circulating a total of over five billion gallons per day. After the steam from the boilers has turned the powerful turbines, which in turn drive the generators, it passes through enormous condensers and is converted back into water that can be re-circulated through the boilers.

The concrete stack is over 300 feet tall. Fuel oil, stored in the tank farm on the property (Feature 4), is used for the boilers. When completed, power was delivered from the steam plant to the power system through two 138k circuit terminating at a receiving stations extending from the plant.

Operation of the original generating unit was handled from a control room equipped with the most advanced remote control devices of the day. Currently, all three units predominantly burn natural gas to provide the thermal heat to produce steam, which drives a steam turbine that in turn drives a generator unit to create electricity. All units are capable of using distillate fuel oil in the event natural gas is not available. Units 1 and 2 also sometimes use a mixture of natural gas and digester gas. The digester gas is supplied from the adjacent Hyperion Wastewater Treatment Plant as a byproduct of its waste treatment process.

This feature will not be affected by the current project.

*B7. **Moved?** No Yes Unknown **Date:** **Original Location:**

*B8. **Related Features:** Yes, the generation units are part of a working power plant and have associated infrastructure and outbuildings. See the primary record for a listing and an attached BSO forms

B9a. Architect: b. Builder: H.B. Nicolson (Williams 1959)

*B10. **Significance: Theme:** **Area:**
Period of Significance: **Property Type:** **Applicable Criteria:**
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

B11. Additional Resource Attributes: (List attributes and codes)

*B12. **References:**

Williams, Frank C. 1934 Intake: monthly magazine for employees of the Los Angeles City Owned Department of Water and Power (October, 1972).

Intake: monthly magazine for employees of the Los Angeles City Owned Department of Water and Power (June, 1972).

B13. Remarks:

(This space reserved for official comments.)

*B14. **Evaluator:** Gini Austerman, M.A.

***Date of Evaluation:** May 3, 2011

(Sketch Map with north arrow required.)



BUILDING, STRUCTURE, AND OBJECT RECORD

Page 5 of 7

*NRHP Status Code

*Resource Name or # Scattergood Generating Station – Feature 2

- B1. Historic Name: Scattergood Generating Station
- B2. Common Name: Scattergood Generating Station
- B3. Original Use: Fuel Storage

B4. Present Use: Fuel Storage

*B5. Architectural Style: Industrial

*B6. Construction History: (Construction date, alterations, and date of alterations)

Originally built in 1958, this tank is located on a terrace above the steam plant in the center of the property approximately 300 feet to the northeast of Units 1 and 2. The service tank is 100 feet in diameter, and was used to contain fuel for the steam generator boilers. The use of fuel oil has been replaced by natural gas, which is supplied by continuous feed from a dedicated pipeline that enters the SGS property from the south via Grand Avenue.

Currently, all three units predominantly burn natural gas to provide the thermal heat to produce steam, which drives a steam turbine that in turn drives a generator unit to create electricity. All units are capable of using distillate fuel oil in the event natural gas is not available. This feature will be demolished as a result of the proposed project.

*B7. Moved? No Yes Unknown Date: Original Location:

*B8. Related Features: Yes, these features are part of a complex of features which comprise the power plant. See the primary record for a listing and an attached BSO forms

B9a. Architect:

b. Builder:

*B10. Significance: Theme:

Area:

Period of Significance:

Property Type:

Applicable Criteria:

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

B11. Additional Resource Attributes: (List attributes and codes)

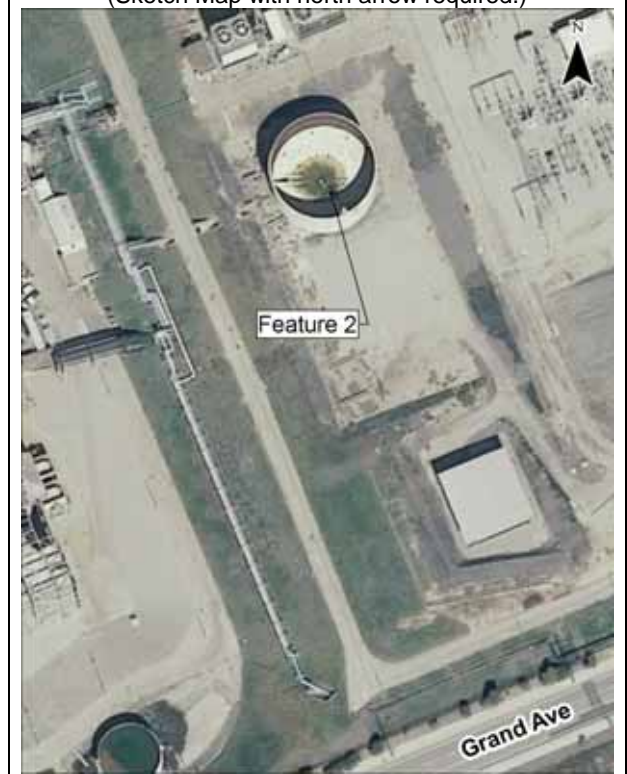
*B12. References:

B13. Remarks:

*B14. Evaluator: Gini Austerman, M.A.

*Date of Evaluation: May 3, 2011

(Sketch Map with north arrow required.)



BUILDING, STRUCTURE, AND OBJECT RECORD

Page 6 of 7

*NRHP Status Code

*Resource Name or # Scattergood Generating Station – Feature 3

- B1. Historic Name: Scattergood Generating Station
- B2. Common Name: Scattergood Generating Station
- B3. Original Use: Water Storage

B4. Present Use: Water Storage

*B5. Architectural Style: Industrial

*B6. Construction History: (Construction date, alterations, and date of alterations)

This feature consists of three metal water tanks, ca. 1958, located in the extreme northeastern portion of the project area on the upper-most terrace. Two are raw water tanks, measuring approximately 75 feet in diameter, and the third is a condensate water tank, approximately 90 feet in diameter. These tanks are not affected by the repowering project; they are not being taken out of service and will remain in use.

*B7. Moved? No Yes Unknown Date: Original Location:

*B8. Related Features: Yes, these features are part of a working power plant, See the primary record for a listing and an attached BSO forms

B9a. Architect:

b. Builder:

*B10. Significance: Theme:

Area:

Period of Significance:

Property Type:

Applicable Criteria:

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

B11. Additional Resource Attributes: (List attributes and codes)

*B12. References:

B13. Remarks:

*B14. Evaluator: Gini Austerman, M.A.

*Date of Evaluation: May 3, 2011

(Sketch Map with north arrow required.)



BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name or # Scattergood Generating Station – Feature 4

B1. Historic Name: Scattergood Generating Station

B2. Common Name: Scattergood Generating Station

B3. Original Use: Fuel Storage Tanks

B4. Present Use: No longer in use

*B5. **Architectural Style:** Industrial

*B6. **Construction History:** (Construction date, alterations, and date of alterations)

On the southeastern portion of the SGS property, across Grand Avenue from the main generator units (Feature 1), there are four large fuel oil storage tanks. Originally constructed in 1958, these tanks are empty and unused but were formerly used to store fuel oil prior to the conversion of SGS to natural gas fuel. These tanks are approximately 200 feet in diameter and 56 feet in height. These tanks are constructed of metal; three of the tanks have the capacity of about 175,000 barrels and the fourth has a capacity of about 200,000 barrels. The tanks are currently not in use and all four tanks are planned to be removed. This area will be used for soil storage during the proposed project.

*B7. **Moved?** No Yes Unknown **Date:** **Original Location:**

*B8. **Related Features:** Yes, these features are part of a complex of features which comprise the power plant. See the primary record for a listing and an attached BSO forms

B9a. Architect:

b. Builder:

*B10. **Significance: Theme:**

Area:

Period of Significance:

Property Type:

Applicable Criteria:

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

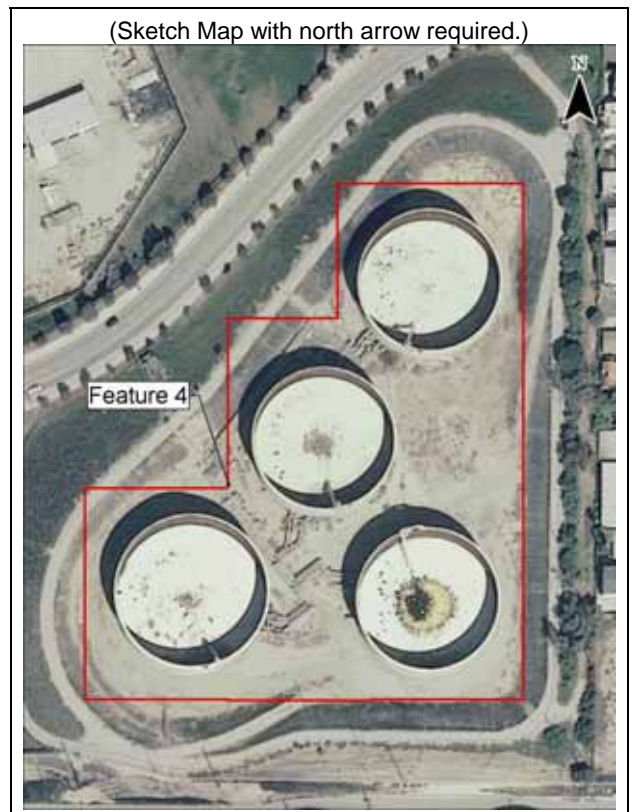
B11. Additional Resource Attributes: (List attributes and codes)

*B12. **References:**

B13. Remarks:

*B14. **Evaluator:** Gini Austerman, M.A.

*Date of Evaluation: May 3, 2011



Attachment 4

Natural History Museum of Los Angeles County Records Search Results

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

October 30, 2022

Michael Baker International

Attn: Jacob Parsley

re: Paleontological resources for the Scattergood Project

Dear Jacob:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the Scattergood project area as outlined on the portion of the Venice USGS topographic quadrangle map that you sent to me via e-mail on October 27, 2022. We do not have any fossil localities that lie directly within the proposed project area, but we do have fossil localities nearby from the same sedimentary deposits that occur in the proposed project area, either at the surface or at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County (NHMLA).

Locality Number	Location	Formation	Taxa	Depth
LACM IP 34957	El Segundo Power Generating Station; Water line trench on Franklin Ave., approx. 10 feet E of Standard St.	Marine Terrace (Late Pleistocene; massive, light brown to reddish-brown sand)	Pismo clam (<i>Tivela stultorum</i>) and other invertebrates	3 feet bgs
LACM VP 34958	El Segundo power generating station	Palos Verdes Sand / San Pedro Formation (well bedded, yellow-tan to green-grey sand)	Invertebrates (unspecified)	20 feet bgs
LACM VP 3264	Los Angeles International Airport	Unknown formation (Pleistocene sands)	Elephant clade (Proboscidea)	25 feet bgs
LACM VP 7332	Westchester, NW of intersection of West Century Blvd & Bellanca Ave	Unknown formation (Pleistocene; silty sand)	Mammoth (<i>Mammuthus</i>)	40 feet bgs
LACM VP 4942	SE corner of Airport Blvd. & Manchester Ave	Unknown formation (Pleistocene, massive sandy)	Mammoth (<i>Mammuthus</i>); bison (Bison); hare (<i>Lepus</i>)	16 feet bgs

		mudstone w scattered pieces of gravel)		
		Unknown (Pleistocene; pebbly gray-green to brown mud that directly overlies a gray-green fine sand)		
LACM VP 3789	8734 Bellanca Avenue, Westchester		Mammoth (<i>Mammuthus</i>)	14 feet bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the NHMLA. It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,



Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

enclosure: invoice