

APPENDIX C

El Segundo Blue Butterfly Survey Report



August 24, 2011

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Subject: Results of an El Segundo Blue Butterfly Habitat Assessment for the Scattergood Generating Station Unit 3 Repowering Project, Located in the City of El Segundo, Los Angeles County, California

Dear Ms. Van Wagner:

A habitat assessment for the federally-listed endangered El Segundo blue butterfly (*Euphilotes battoides allyni*) was conducted by Michael Brandman Associates (MBA) at the request of LADWP within the Scattergood Switch Yard in the City of El Segundo, Los Angeles County, California. LADWP proposes to replace the capacity of the Scattergood Generating Station (SGS) Unit 3 with natural gas-fired combustion turbines and heat recovery steam generator(s) operating in both simple and/or combined cycle configuration.

The proposed project is being implemented primarily to improve LADWP's aging infrastructure with more reliable, dispatchable, and efficient gas turbine technology. It is also being implemented in part pursuant to a formal Settlement Agreement (May 2003) between LADWP and the South Coast Air Quality Management District (SCAQMD) to reduce air pollutant emissions from stationary sources in the South Coast Air Basin (SCAB) under the provisions of the Regional Clean Air Incentives Market (RECLAIM) program.

SGS is located at 12700 Vista Del Mar in the City of Los Angeles (community of Playa Del Rey). It is adjacent to the Pacific Ocean and approximately 1.5 miles south of Los Angeles International Airport (LAX). The facility is located on approximately 56 acres that is bounded to the west by Vista Del Mar and Dockweiler State Beach. The City of Los Angeles' Hyperion Wastewater Treatment Facility is located north of the site. The City of El Segundo is located to the south, east, and northeast. Residential neighborhoods and light retail commercial uses in El Segundo border SGS to the east and northeast. Grand Avenue divides the SGS property north and south; all the active generation and generation support facilities are located north of Grand Avenue.

SGS is bordered to the east by the large Chevron El Segundo refinery. Approximately 2 acres of the Chevron El Segundo refinery is designated as a El Segundo blue butterfly 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 LAX located east of Vista Del Mar and west of Pershing Drive. Due to the close proximity of these two known El Segundo blue butterfly (ESB) populations, a habitat assessment was required on the site 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 a week or so 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

The survey area within SGS consisted of three distinct areas (Attachment 1). The first survey area, survey area 1, is the open space area surrounding the 4 storage tanks, which will be demolished. This survey area is closest to the Chevron Refinery ESB habitat preserve.

The second survey area, survey area 2, is located within the open space located near the intersection of Grand Avenue and Vista Del Mar and west of the 4 storage tanks. This area is proposed to be a stockpile area for fill dirt.

The final survey area, survey area 3, is located in the easement, east of Hyperion Wastewater Treatment Facility, west of the residential neighborhood along Hillcrest Street, and north SGS.

The three survey areas were surveyed by MBA's permitted ESB biologist, Kelly Rios (permit # TE-0108909-3). The habitat assessment was conducted on March 3, 2011 at approximately 0830 hours with overcast skies and an average temperature of 62 degrees. No observations of ESB were expected to occur since the habitat assessment was conducted outside the ESB's flight season.

Findings

Survey area 1, near LADWP gate #10, consists of a non-native grassland plant community located on a down-hill slope to the storage tanks. Non-native species include ripgut 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 in this plant community and include telegraph weed (*Heterotheca grandiflora*) and deerweed (*Lotus scoparius*). The down-hill slope to the paved access road consists of non-native hottentot fig (*Carpobrotus edulis*).

Many non-native trees occur on the east site of the storage tanks and act as a natural barrier between SGS and the residential development. These tree species include acacia (*Acacia* sp.), pittosporum (*Pittosporum* sp.), magnolia (*Magnolia* sp.), and eucalyptus (*Eucalyptus* sp.).

The Chevron Refinery ESB habitat preserve borders survey area 1 at the southeast corner and is separated by a chain-link fence. However, much of the view is obstructed by the presence of large acacia trees. Approximately 3 coast buckwheat plants in the preserve were within 50 feet of the chain-link fence. These plants were in senescence and flower production was relatively low. No recruitment of coast buckwheat plants were observed either within the preserve or SGS side of the fence. Hottentot fig surrounds the acacia trees, providing very little open space on the soil surface for coast buckwheat recruitment.

Survey area 2, adjacent to LADWP gate #7, is the proposed stockpile location. This survey area is also dominated by non-native species interspersed with a few native plants. Hottentot fig is the dominant species adjacent to the paved access road. Additional non-native plant species include red-stemmed filaree, ripgut brome, slender oats, and Bermuda buttercup (*Oxalis pes-caprae*). Brazilian peppertree (*Schinus terebinthifolius*) borders the chain-link fence.

A few native species were observed within survey area 2 and include deerweed, California croton (*Croton californica*), and cudweed (*Gnathaliium canescens*). A few additional native species are typically found in dune plant communities and were observed in low densities within survey area 2 including, beach primrose (*Camissonia chieranthifolia*), dunes wallflower (*Erysimum suffrutescens*), and bush lupine (*Lupinus chamissonis*). No coast buckwheat plants were observed in survey area 2.

Survey area 3 also consists of a non-native grassland plant community. The plant community was moderately vegetated with non-native species, including slender oats, ripgut brome, wild radish (*Raphanus sativus*), western ragweed (*Ambrosia psilostachya*), and hottentot fig. Scattered acacia trees were found throughout the site. Only two native plant species were observed, deerweed and cudweed. Although very sandy soils were present on the site, no coast buckwheat plants were observed within the survey area.

Conclusion

Three distinct survey areas were surveyed for the presence of suitable habitat for ESB, specifically for the coast buckwheat. None of the three survey 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 directly within the survey areas. Although the Chevron refinery habitat preserve is adjacent to survey area 1, there are no coast buckwheat within the survey area. Additionally, it is not likely that the ESB will fly through the fence into SGS due to the natural barrier that the acacia presents and the lack of host plants in the area. The plant species observed within this community consists mainly of ruderal species that commonly occur in a non-native grassland plant community or disturbed habitat. Therefore, no ESB or suitable habitat will be impacted by the proposed expansion of the existing facility 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 me at 714.508.4100 ext 1038.

Sincerely,



Kelly Rios, Senior Project Manager
Michael Brandman Associates
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Irvine, CA 92602

Encl: Attachment 1 LADWP Scattergood ESB Habitat Assessment

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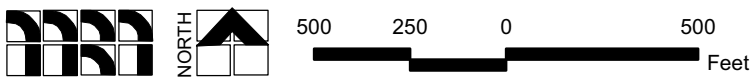
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Legend

- Survey Areas
- Project Boundary
- Chevron Refinery ESB Habitat Preserve

Source: NAIP Los Angeles, CA (2009), Powers Engineers, LADWP.



Michael Brandman Associates

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Attachment 1 Survey Areas

LADWP SCATTERGOOD ESB
HABITAT ASSESSMENT