Initial Study

Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project

Lead Agency:

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Environmental Planning and Assessment
111 N. Hope Street, Room 1044
Los Angeles, California 90012

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TABLE OF CONTENTS

List of Figures

ACRONYMS AND ABBREVIATIONS

ACC	air-cooled condenser
AQMP	Air Quality Management Plan
BACT	best achievable control technology
BMPs	best management practices
CCGS	combined-cycle generation system
CEQA	California Environmental Quality Act
CIRP	California Native Plant Society Inventory of Rare and Endangered Plants of California
City	City of Los Angeles
CNDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
EIR	environmental impact report
ESB	El Segundo blue butterfly
FAA	Federal Aviation Administration
GHG	greenhouse gas
HRSG	heat recovery steam generator
IPaC	Information for Planning and Consultation
kV	kilovolt
LA100	Los Angeles 100% Renewable Energy Study
LADOT	City of Los Angeles Department of Transportation
LADOT Guidelines	LADOT Transportation Assessment Guidelines
LADWP	Los Angeles Department of Water and Power
LAX	Los Angeles International Airport
MM	Mitigation Measure
MRZ	mineral resource zone
MW	megawatt
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OPR	Office of Planning and Research
OTC	once-through cooling
PF-1	Public Facilities
Scattergood	Scattergood Generating Station
SCAQMD	South Coast Air Quality Management District
SCR	selective catalytic reduction
SLTRP	Strategic Long-Term Resources Plan
SVP	Society for Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
VMT	vehicle miles traveled
WRP	Water Reclamation Plant
WSAC	wet-surface air cooler
VHFHSZ	Very High Fire Hazard Severity Zone

1 PROJECT DESCRIPTION

1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) 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 gas. This hydrogen-ready capability would allow LADWP to begin the conversion from natural gas to green hydrogen in its in-basin combustion-turbine generation system as the City of Los Angeles (City) transitions to a carbon-free electrical energy system. The Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project (referred to herein as the proposed project) would replace the generation capacity of existing Scattergood Units 1 and 2, which are conventional natural-gas-fired steam-boiler generators that will be removed from service. The proposed CCGS would consist of a combustion-turbine generator and a steam-turbine generator operating in tandem. When compared to the existing steam-boiler Units 1 and 2, the CCGS would substantially increase fuel efficiency, thereby also reducing the emission of air pollutants and greenhouse gases (GHGs) relative to the amount of energy produced. The CCGS would be fully operational by the end of 2029.

The proposed project has been identified by LADWP based on the findings and recommendations contained in the Los Angeles 100% Renewable Energy (LA100) Study,[1] which establishes a pathway for the City to transform its electrical power supply to carbon-free resources. The LA100 study, the final report for which was published in 2021, was a multi-year effort undertaken jointly by the National Renewable Energy Laboratory and LADWP with active participation by the LA100 Advisory Group consisting of representatives from neighborhood councils, environmental organizations, business and labor groups, academia, city government, and the renewable energy industry. Various scenarios reflecting a range of energy demand-related and supply-related factors were analyzed in the study. However, across all scenarios, the requirement for firm local generation assets (i.e., located within the Los Angeles Basin) that can be readily dispatched in a controlled manner in response to demand was recognized as essential under a range of foreseeable but unpredictable circumstances that could temporarily severely limit the supply of renewable energy resources coming into the city. Under such circumstances, firm local generation would be critical to maintaining system reliability and resilience and avoiding power grid collapse.

Based on the findings of the LA100 study, the proposed project has been identified as an integral component of LADWP's Draft 2022 Strategic Long-Term Resources Plan (SLTRP),[2] which establishes a roadmap for reliable and sustainable electrical power for the City, while also providing the strategy to achieve a carbon-free energy system by 2035, relying primarily on renewable solar, wind, and geothermal generation resources as well as large-capacity energy storage facilities. However, as discussed above, the continued availability of firm local generation that can be dependably and rapidly dispatched to respond to demand for energy in the LADWP service area has been identified in the SLTRP as necessary to maintain the reliability and resilience of the City's electrical power grid during and after the transition to a

[1] Cochran, Jaquelin, and Paul Denholm, eds. 2021. The Los Angeles 100% Renewable Energy Study. Golden, CO: National Renewable Energy Laboratory. NREL/TP-6A20-79444. Available at: https://maps.nrel.gov/la100/la100-study/report. Accessed February 2023.

[2] LADWP. Draft 2022 Strategic Long-Term Resources Plan. Available at: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-intgt-res-plning?_adf.ctrl-state=1cgy8kd04d_4&_afrLoop=1162602383021912. Accessed February 2023.

carbon-free system. This transition will occur as the demand for electricity in the City is also anticipated to increase substantially with the electrification of various functions currently powered by the combustion of fossil fuels (e.g., cooking, space heating, water heating, and the transportation sector).

The LADWP in-basin combustion-turbine generation system, including Scattergood and other generating stations, would be retained through a conversion to renewable hydrogen fuel. However, unlike current operations, under which the combustion turbines provide a substantial proportion of the City's energy on a daily and annual basis, the hydrogen turbines would be operated infrequently, only to meet rare critical peaks in daily demand that exceed the available supply provided by renewable generation resources or during relatively short-term periods when the renewable generation resources may become unavailable due to emergency circumstances (e.g., the temporary loss of critical renewable energy transmission lines caused by wildfire or earthquake). Therefore, although anticipated to be used infrequently, this dependable local generation capability is nonetheless crucial to maintaining the reliability and resilience of the LADWP power system. Scattergood has been identified as the most immediate and instrumental location in relation to the requirement for dependable generation capacity due to the electrification of Los Angeles International Airport (LAX), the potential implementation of increased wastewater treatment capabilities at the City's Hyperion Water Reclamation Plant (WRP), and anticipated growth in demand for electricity in the western areas of the City that Scattergood serves.

1.2 California Environmental Quality Act (CEQA) Documentation

1.2.1 Scope of CEQA Documentation

CEQA (California Public Resources Code Section 21000 et seq.) applies to proposed projects initiated by, funded by, and/or requiring discretionary approvals from state or local government agencies. The construction and operation of the proposed Scattergood hydrogen-ready CCGS constitutes a project as defined by CEQA (California Public Resources Code Section 21065). Section 15367 of the CEQA Guidelines (14 California Code of Regulations 15000–15387) states that a CEQA lead agency is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, as a municipal utility that would fund, implement, and have discretionary approval authority for the proposed project, LADWP is the lead agency responsible for compliance with CEQA.[3]

As the CEQA lead agency, LADWP must complete an environmental review to determine if implementation of the proposed project may result in significant adverse environmental impacts as defined under CEQA and to propose measures and/or alternatives, as feasible, to reduce or eliminate any such identified impacts. LADWP has prepared a CEQA Initial Study to help determine if the proposed project could have the potential to cause significant adverse impacts. Based on the conclusions in the Initial Study (contained herein), LADWP has determined that the proposed project may potentially create significant impacts related to various environmental factors considered under CEQA. Therefore, LADWP will prepare an Environmental Impact Report (EIR) for the proposed project pursuant to CEQA. Environmental factors that were determined in the Initial Study to have less than significant impacts (with or without the incorporation of mitigation measures) will not be carried forward, in whole or in part, for further

[3] Pursuant to the Warren-Alquist Act, the California Energy Commission would not be the lead agency or a responsible agency for the proposed project because it would not result in a 50 megawatt (MW) or greater increase in permitted gross generating capacity at Scattergood.

detailed evaluation in the EIR and, in accordance with Section 15063 of the CEQA Guidelines, the EIR analysis will focus on those environmental factors that may involve potentially significant impacts.

1.2.2 Scattergood Once-Through Cooling System

As part of the proposed project, an air-cooled condenser (ACC) would be employed for the required condensation of steam in the CCGS, and the existing ocean-water once-through cooling (OTC) system used for this purpose for Units 1 and 2 would no longer be used. By ceasing use of the remaining ocean-water OTC system at Scattergood with the removal from service of Scattergood Units 1 and 2, LADWP will comply with the statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling, also referred to as the OTC Policy. The OTC Policy was implemented by the State Water Resources Control Board (SWRCB) to establish standards to comply with federal Clean Water Act Section 316(b) to reduce potential effects on marine life associated with the operation of cooling water intake structures. The environmental impacts of discontinuing OTC at coastal generating stations throughout California, including Scattergood, have been previously addressed under CEQA by the SWRCB.[4] In accordance with a timetable established by SWRCB, the Scattergood OTC system is currently scheduled to be removed from service by the end of 2024. However, because of the critical role of Units 1 and 2 in maintaining grid reliability until the proposed project CCGS is operational at the end of 2029, LADWP is currently pursuing an extension of the OTC Policy compliance date for Scattergood to December 31, 2029.

The portions of the OTC facilities located outside the boundaries of Scattergood are subject to lease agreements from the California State Lands Commission for offshore portions and the California Department of Parks and Recreation for onshore portions. In accordance with the terms of these leases and at the discretion of these agencies, the facilities must be removed, and the sites restored when the facilities are no longer used for the purpose stipulated in the leases (i.e., generator system cooling). The decision regarding the final disposition of the facilities after cessation of use (i.e., abandonment or complete or partial removal) would be subject to regulatory oversight and approval by State and federal agencies that would not have regulatory or approval authority over the proposed project, including the California State Lands Commission, California Department of Parks and Recreation, California Coastal Commission, U.S. Army Corps of Engineers, and National Marine Fisheries Service.

The implementation of the proposed project would have no bearing on the requirement to cease operation of the OTC system, which is separately required under the OTC Policy. Similarly, the decision regarding the final disposition of the OTC facilities within the lease areas is unrelated to the implementation of the proposed project. Any construction work associated with potential removal of the OTC facilities would occur after the proposed project implementation and, therefore, would not overlap with construction activities related to the proposed project. Therefore, the analysis of potential impacts related to the final disposition of the OTC facilities located outside of Scattergood will be addressed via a separate CEQA environmental process. As such, the following Initial Study does not, and the EIR will not, address the determination of the final disposition of the OTC facilities. It is anticipated that the CEQA environmental analysis necessary to support this determination will be completed prior to the decommissioning of the

[4] California State Water Resources Control Board. Ocean Standards – Clean Water Act §316(b) Regulation: Cooling Water Intake Structures Once-Through Cooling Water Policy – Official Policy Documentation. Available at: https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/policy.html. Accessed September 2022.

existing Units 1 and 2 OTC system, which, as discussed above, is anticipated to occur by the end of 2029.

1.2.3 Green Hydrogen

Green hydrogen is a carbon-free fuel that is produced through a process called electrolysis, in which water is split into hydrogen and oxygen using renewable electricity. The necessary infrastructure for the production, transport, and storage of green hydrogen to support the proposed project currently does not exist. As a result, LADWP has issued and received responses to a Request for Information from industry experts to provide potential solutions and strategies for a supply of green hydrogen that could support the conversion from natural gas to green hydrogen fuel in the LADWP in-basin combustion-turbine electrical generation system, including for the proposed project CCGS. The Request for Information covers the potential hydrogen capacity of LADWP's in-basin generating stations; the potential for retrofits of existing natural-gas combustion turbines to run on green hydrogen; options for new green hydrogen combustion turbines; technology considerations in relation to various aspects of the green hydrogen supply chain, including production, transportation, storage, and end use; and considerations for safety and environmental stewardship related to green hydrogen. LADWP also continues to partner with organizations such as the Low-Carbon Resources Initiative, the Green Hydrogen Coalition, the Alliance for Renewable Clean Hydrogen Energy Systems, and others to accelerate the adoption of green hydrogen as a component of a carbon-free energy system.

While it is anticipated that a sufficient supply of green hydrogen may be available to support the proposed project dual-fuel CCGS when it is fully commissioned in 2029, the nature of the green hydrogen system in terms of production, transport, and storage is currently unknown. Therefore, the following Initial Study does not, and the EIR will not, address the supply of green hydrogen, which will be analyzed under a separate CEQA document when the necessary information to support an adequate analysis of potential environmental impacts is available.

Nonetheless, because the combustion-turbine generator component of the proposed CCGS would be capable of operating on a mixture of natural gas and hydrogen fuel, the impacts related to the combustion of such a fuel mixture will be analyzed in the EIR. Because the exact CCGS that would be installed at Scattergood cannot be established until the award of contract for the proposed project (which could occur only after the completion of the CEQA process), LADWP is considering, under a competitive process, systems with similar parameters from three manufacturers. To meet the minimum requirements of the proposed project CCGS, these systems must be capable of combusting a mixture of natural gas and at least 30 percent hydrogen. However, the analysis of the impacts for each manufacturer's system related to the combustion of the natural gas/hydrogen fuel mixture will be based on the maximum percentage of hydrogen that each system can provide, as proposed by the manufacturer. In addition, the impacts related to the combustion of 100 percent natural gas will also be analyzed in the EIR based on a conservative assumption that this may be the circumstance during the initial phases of operation of the proposed CCGS. In this manner, the analysis will consider the extremes of fuel-mixture (i.e., from the maximum percentage of hydrogen, as proposed by the manufacturer, to 100 percent natural gas), which would define the limits of the impacts related to combustion.

1.3 Project Location and Surroundings

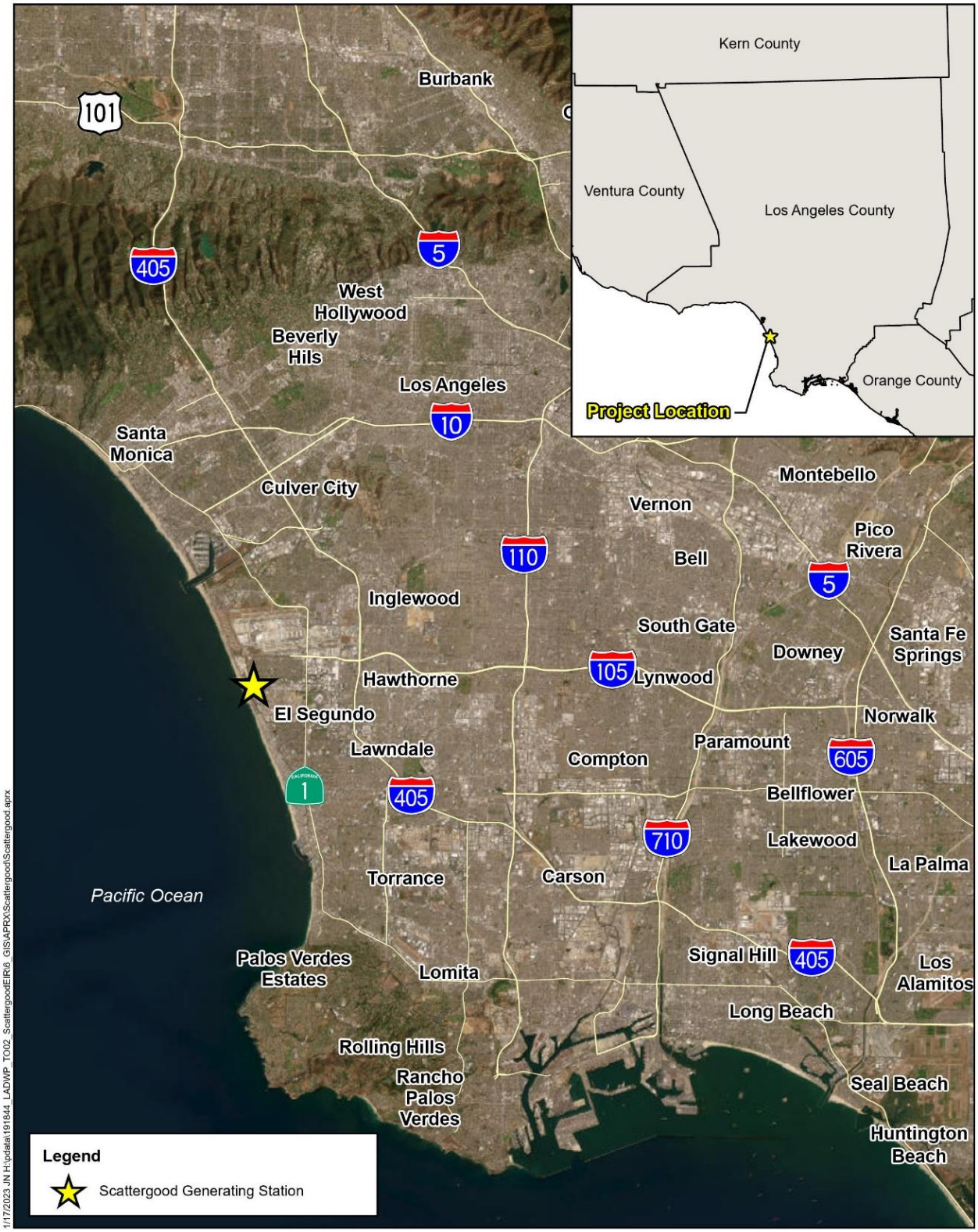
Scattergood is located in the Playa del Rey community of the City of Los Angeles at the intersection of Vista Del Mar and Grand Avenue. Grand Avenue, an east-west thoroughfare, divides the Scattergood property into northern and southern parcels. The southern parcel is

approximately 15 acres, and the northern parcel is approximately 37.5 acres. All permanent operational facilities at Scattergood are located within the northern parcel. All of Scattergood is zoned PF-1 (Public Facilities) under the City's zoning code and is designated as a Public Facilities land use under the City's General Plan.

Grand Avenue is classified as a local street in the City's Mobility Plan 2035, with two travel lanes in the westbound direction and one travel lane in the eastbound direction. No on-street parking lanes are provided. Concrete sidewalks and Tier 2 bicycle lanes (i.e., separate bicycle-only lanes demarcated by a solid stripe) are located along both sides of the street. The main gate for the northern parcel of Scattergood is located along Grand Avenue. An entry drive for the southern parcel is located opposite the main gate. Center left-turn lanes are located on Grand Avenue for both the main gate and the southern parcel entry drive. Vista Del Mar, located along the western edge of Scattergood, is a north-south thoroughfare classified as an Avenue II in the Mobility Plan, with two travel lanes in each direction. No formal sidewalks or demarcated bicycle lanes are provided on Vista Del Mar fronting Scattergood. Center left-turn lanes are located southbound at the Grand Avenue and northbound into a beach parking lot entrance opposite Grand Avenue. There is also a northbound right-turn lane and a southbound left-turn lane on Vista Del Mar for the Scattergood secondary gate in the northwest corner of the station.

Dockweiler State Beach is located to the west of Scattergood and Vista Del Mar. The approximately 120-acre Hyperion WRP, located within the City of Los Angeles, is adjacent to Scattergood on the north. The City of El Segundo borders Scattergood on the northeast, east, and south. Residential neighborhoods within El Segundo are located to the northeast and east, and the approximately 1.5-square-mile Chevron El Segundo Refinery is adjacent to the south.

In addition to the areas that are immediately adjacent to Scattergood, uses within 0.5 miles of the station include additional residential neighborhoods; commercial establishments; elementary, middle, and high schools; public parks; and government buildings. All of these uses are located within the City of El Segundo. The El Segundo Energy Center, a 560-megawatt (MW) natural-gas-fired generating station, is located approximately 0.4 miles south of Scattergood along the west side of Vista Del Mar. LAX, located within the City of Los Angeles, is approximately 0.75 miles north of Scattergood. Figure 1 shows the regional location of Scattergood, and Figure 2 shows Scattergood and the surrounding area.



LA DWP

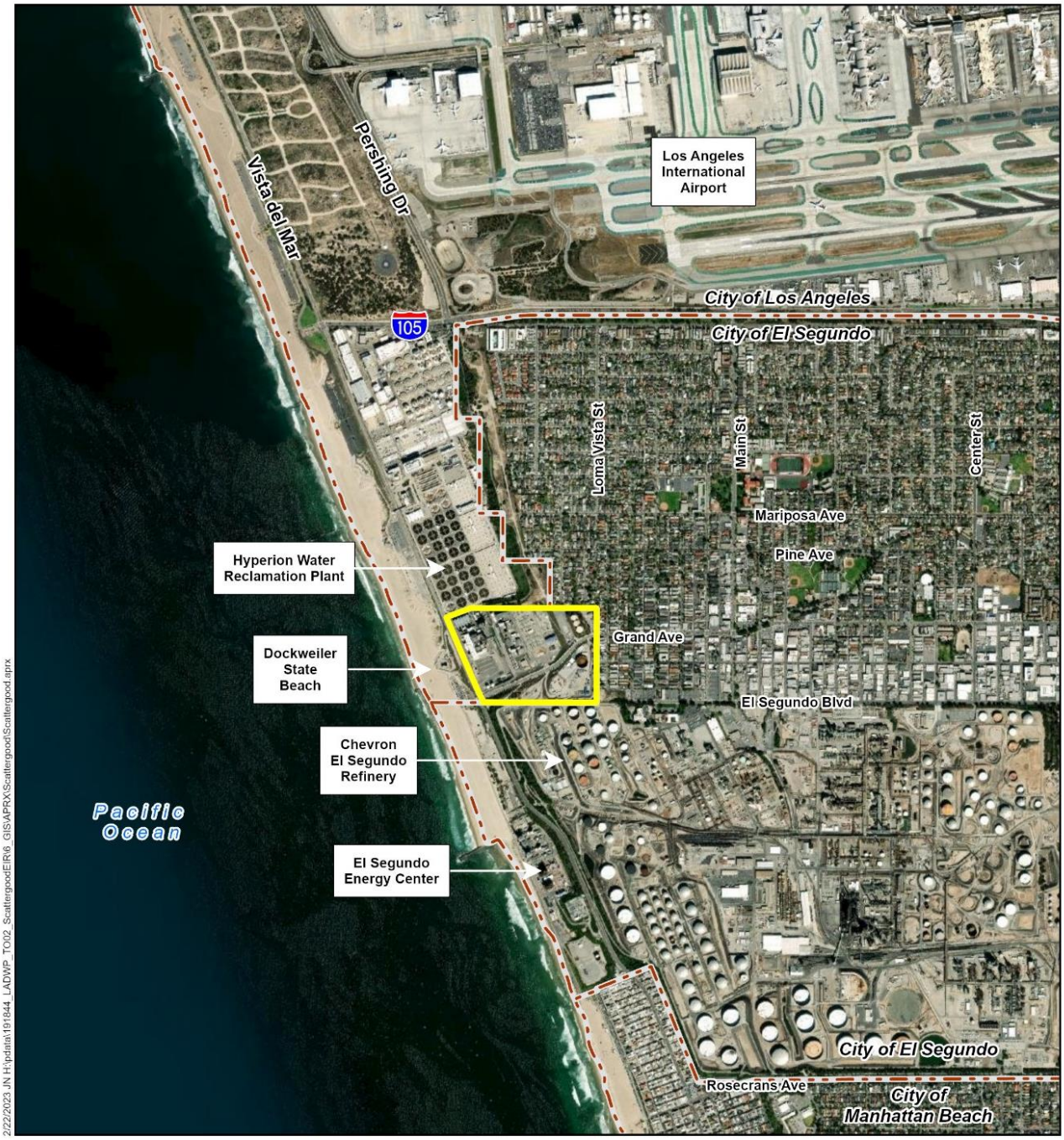
0 2 4 Miles

Source: ArcGIS Online, 2018

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

Regional Location Map

Figure 1



Legend

Scattergood Generating Station

City Boundary

LA DWP

0 1,000 2,000 Feet

Source: ArcGIS Online

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

Project Site

Figure 2

1.4 Existing Conditions at Scattergood

The southern parcel of Scattergood (south of Grand Avenue) does not contain any operation facilities (i.e., generation units or ancillary functions). Oil-drilling facilities, operated by a third party under lease from LADWP, are located on an approximately 1.5-acre area in the central portion of the parcel. Excess soil from the previous construction activities at Scattergood is stockpiled at the western end of the southern parcel. An approximately 7-acre area at the eastern end of the parcel is relatively flat and paved with gravel. Since 2013, this portion of the property has been used as a construction support area at Scattergood for generator construction and various underground transmission cable installation projects that commence at the Scattergood switchyard. Several temporary administrative and warehouse buildings are currently located in this area. This area also includes a single large aboveground tank that previously stored fuel oil for the operation of the generators prior to the conversion to the use of natural gas for generation. The tank has been emptied and cleaned, and it is wrapped in a mural that depicts various aspects of the history of El Segundo and the Southern California surf culture.

As mentioned above, all existing permanent operational facilities at Scattergood are located in the northern parcel (north of Grand Avenue). The northern parcel rises in elevation from west to east and contains three terraces that are separated by landscaped embankments or retaining walls. It is a fully developed industrial site, with the landscape embankments as essentially the only areas not paved or occupied by facilities. The existing generation units are located on the lower and middle terraces. The middle terrace is otherwise occupied primarily by the switchyard that connects the generation units to the LADWP high-voltage transmission network. The upper terrace contains three large aboveground tanks that store water used in various processes at the station.

An approximate 3-acre vacant area in the southwest corner of the northern parcel was the site of the former Scattergood 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.

Scattergood currently includes six operating generation units. The units have a combined net maximum generation capacity of 778 MW. The units supply power to the LADWP in-basin electrical transmission grid. Units 1 and 2 were placed into operation in 1958 and 1959, respectively. These units each employ a natural-gas-fired boiler that produces steam that drives a turbine, which in turn drives a generator to produce electricity. Units 1 and 2 together provide 261 MW of net maximum capacity (105 MW for Unit 1 and 156 for Unit 2). They are located on the lower terrace of Scattergood and share a common approximately 300-foot tall exhaust stack.

Units 4 and 5 were placed into operation in 2015. Unit 4 is a natural-gas-fired combustion-turbine generator, and Unit 5 is a steam-turbine generator. However, the units operate in tandem as a CCGS. The heated exhaust from the Unit 4 combustion turbine passes through a heat recovery steam generator (HRSG), where it is used to produce steam, and then through an approximately 215-foot tall exhaust stack. The steam produced in the HRSG is used to drive the Unit 5 steam-turbine generator. The exhaust steam from Unit 5 is condensed in an ACC and returned to the HRSG in a continuous loop. The CCGS has a total net maximum capacity of 313 MW (206 MW for the Unit 4 combustion-turbine generator and 107 MW for the Unit 5 steam-turbine generator). The CCGS is located on the lower terrace, to the north of Units 1 and 2.

Units 6 and 7 were also placed into service in 2015. They are simple-cycle generation systems consisting of combustion-turbine generators with individual approximately 100-foot tall exhaust stacks. Each unit operates independently and has a net maximum capacity of 102 MW. Units 6 and 7 provide rapid response capability in terms of starting, ramping up and down, and shutting down to closely follow changes in demand for electrical energy, which increases overall system efficiency. Units 6 and 7 are located on the middle terrace, to the east of the other generation units and to the west of the switchyard.

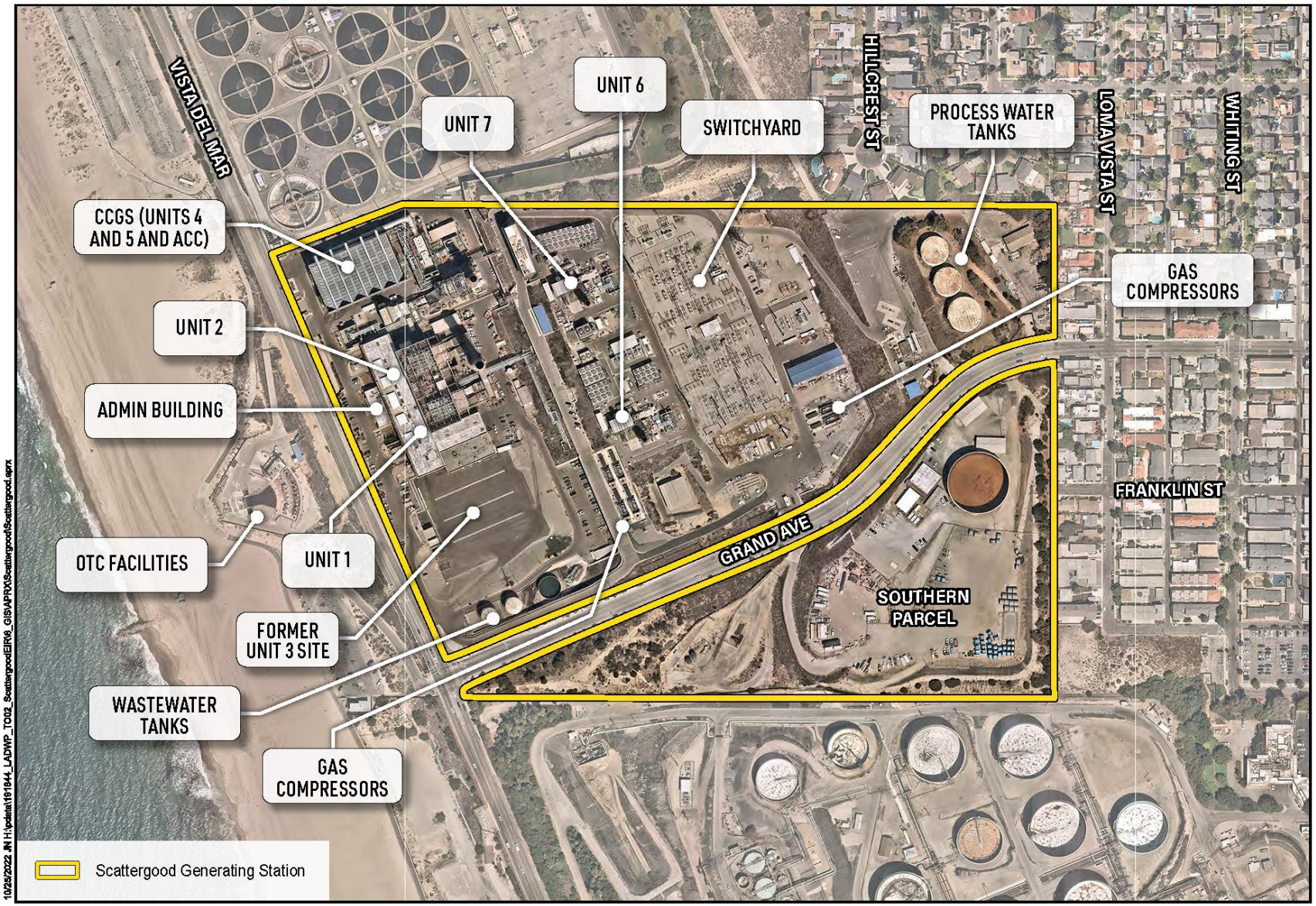
Together, Units 4, 5, 6, and 7 have a combined net maximum capacity of 517 MW. They replaced the generation capacity of the since demolished Unit 3, which had a net capacity of 450 MW. To enable the increase of 67 MW (i.e., from 450 MW to 517 MW), the generation capacity of Unit 1 was physically and permanently reduced by an equivalent amount resulting in the existing net capacity of 105 MW.

All generating units at Scattergood use selective catalytic reduction (SCR) systems, a post-combustion control technology for reducing oxides of nitrogen (NO_X) air pollutant emissions. The SCR systems reduce NO_X emissions by injecting aqueous ammonia (a solution of ammonia and water) and oxygen into the flue gas in the presence of a catalyst, creating a chemical reaction that produces nitrogen and water vapor. Aqueous ammonia used in this process is stored in aboveground tanks at Scattergood.

The natural gas used at Scattergood is supplied by continuous feed from a dedicated pipeline that enters the Scattergood property from Grand Avenue. Natural gas compression equipment to ensure optimum pressure of the gas prior to use in the combustion turbines is located on the middle terrace. Water used during the power generation processes (other than the ocean water associated with the OTC system) is stored in the three aboveground tanks on the upper terrace at the eastern end of the property. Potable water is stored in two of the tanks, and water that has undergone treatment (reverse osmosis) prior to actual use in the generator systems is stored in the other tank.

The electrical energy generated at Scattergood is sent to a switchyard located on the middle terrace in the central portion of the station property. Electrical energy is transmitted from the switchyard through the 138-kilovolt (kV) Scattergood-Airport Transmission Line or the 230-kV Scattergood-Olympic Transmission Line, which are connected to several electrical receiving stations, from which energy is provided to the west side of the City, including LAX.

Numerous maintenance buildings, storage buildings, and outdoor storage areas are located in the northern parcel of Scattergood. Most administrative functions are housed in a building adjacent to Units 1 and 2, near the western end of the property. The control room for Units 1 and 2 is located in the turbine hall adjacent to this building. The control room for Units 4, 5, 6, and 7 is located in a building on the middle terrace. Station employee vehicle parking is accommodated primarily in a paved lot along the western edge of the parcel. The perimeter of both the southern and northern parcels are completely fenced. Figure 3 shows the existing facilities at Scattergood.



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

Existing Site

Figure 3

1.5 Description of the Proposed Project

1.5.1 Project Facilities

Dual-Fuel Combined-Cycle Generation System

The proposed CCGS would have a maximum permitted gross generation capacity of 346 MW. The CCGS would be located in the southwest corner of the station on the approximately 3-acre site previously occupied by Unit 3. It would be physically similar to the existing CCGS located in the northwest corner of Scattergood (Units 4 and 5) except it would be capable of operating on a mixture of natural gas and hydrogen gas. The CCGS would include a combustion-turbine generator (designated as Unit 8), the exhaust heat from which would be passed through an HRSG, where it would be used to produce steam to drive a steam-turbine generator (designated Unit 9). The exhaust from the combustion-turbine generator would exit the HRSG and would be discharged to the atmosphere via an exhaust stack.

The exhaust steam from the steam-turbine generator would be routed to an ACC, where it would be condensed by fans that would force air over tubes containing the steam, dissipating the heat to the surrounding atmosphere. The ACC would be a structure approximately 120 feet wide, 210 feet long, and 100 feet tall. The condensate (i.e., water) from the ACC would be pumped back to the HRSG to be converted into steam in a closed-loop system.

The proposed CCGS would use a combination of processes to control air pollutant emissions. The combustors in the combustion turbines would use dry low NO_X burners to reduce emissions of NO_X. An SCR system also would be provided to further reduce NO_X emissions. A carbon monoxide catalyst would also be installed to comply with the South Coast Air Quality Management District's (SCAQMD's) New Source Review and Best Available Control Technology (BACT) requirements.

Wet Surface Air Cooler

Cooling for generator functions other than the condensation of steam would be provided by a wet-surface air cooler (WSAC) that would be located on the middle terrace of Scattergood. The WSAC would use recirculating spray water and an induced flow of air to cool process water contained in a series of tubes via evaporative cooling, releasing water vapor to the atmosphere. The cooled water would be routed back in a closed loop system to the CCGS and auxiliary functions.

Gas Compressors

New gas compressors would be installed to compress natural and hydrogen gas to the required pressure prior to combustion in the proposed combustion turbine (Unit 8). The new compressors would be similar to and located adjacent to the existing compressors on the middle terrace of Scattergood. The compressors would be located within a walled enclosure to attenuate noise. New gas pipelines from the compressors to Unit 8 (the proposed CCGS combustion turbine) would be installed.

Aqueous Ammonia Supply

As with current operations at Scattergood, aqueous ammonia (29 percent concentration in water) would be used in the SCR systems of the proposed CCGS. Ammonia for the new equipment would be obtained from the existing ammonia storage tanks. Ammonia would be routed from the storage tanks to the CCGS via new piping. No new ammonia storage facilities and no increase in the number or rate of deliveries of ammonia would be required since

ammonia used for the proposed project combustion turbine would be offset by the reduction in ammonia use associated with removal from service of existing Generation Units 1 and 2.

Industrial Wastewater

Potable water is currently used at Scattergood and would continue to be used after implementation of the proposed project for various purposes related to the operation of the generation units. This water must generally be treated to remove undesirable constituents, such as dissolved minerals and suspended impurities, that are detrimental to the operation of the cooling equipment, pollution control elements, and other components of the generation systems. This water purification process involving reverse osmosis and other demineralization processes generates non-usable wastewater byproduct.

In addition to the reverse osmosis/demineralization processes, industrial wastewater is also generated through blowdown (the periodic removal of process water from the operating systems to maintain water quality) and other processes. This wastewater is currently temporarily stored in holding tanks at Scattergood and discharged at highly diluted concentrations to the ocean via the OTC system for Units 1 and 2. However, after implementation of the proposed project, the OTC system would no longer be available for the purpose of wastewater discharge. Under the proposed project, a portion of the industrial wastewater generated at Scattergood, primarily blowdown water, would be recycled for reuse in the generation units. This would entail the reconfiguration of the existing wastewater collection pipelines within Scattergood. The recycling of wastewater would reduce the volume of wastewater that would need to be discharged. LADWP is considering various options to address this wastewater, including the potential for it to be treated at the adjacent Hyperion WRP. This option would require the installation under the proposed project of a dedicated pipeline within Vista Del Mar to transmit the wastewater to Hyperion WRP.

Recycled Water

Recycled water (i.e., tertiary treated wastewater) is currently used for irrigation at Scattergood. This water is delivered via pipelines from the West Basin Municipal Water District's Edward C. Little Water Recycling Facility, located in El Segundo. As discussed above, a portion of the industrial wastewater generated at Scattergood would be recycled under the proposed project for use in the generation units. In addition, to further reduce the use of potable water, it is currently planned that the use of recycled water from outside sources would be expanded under the proposed project, either with increased supplies from Edward C. Little and/or with new supplies from Hyperion WRP. No modifications of the supply infrastructure from Edward C. Little to Scattergood would be required. However, if additional recycled water were supplied from Hyperion WRP, a new recycled water supply line to Scattergood would be necessary. This recycled water may require treatment similar to the potable water used at Scattergood for various processes (i.e., reverse osmosis and demineralization) and could also require chemical additives to minimize damage, such as corrosion and scaling, to systems. This would require an expansion of the water treatment equipment at Scattergood.

Stormwater Handling

Stormwater runoff from Scattergood is captured in catch basins located throughout the station and treated as necessary in separators or via settlement. The stormwater is currently discharged through the Units 1 and 2 OTC system. Since the OTC system would be removed from service following implementation of the proposed project, it would no longer be available for the purpose of stormwater discharge. Therefore, under the proposed project, stormwater runoff would be collected, treated, temporarily stored in holding tanks, and reused to the extent

possible at Scattergood. LADWP is considering various options for the discharge of stormwater that could not be reused, including the potential for it to be transmitted to Hyperion WRP via a new dedicated wastewater line that would be installed in Vista Del Mar under the proposed project.

Switchyard

The proposed CCGS would be connected to the existing switchyard. Energy provided by the proposed generation units would be produced at approximately 13.8 kV and stepped up to 138 kV and/or 230 kV using transformers. It would then be transmitted through the existing transmission system connected to Scattergood. Within the switchyard, new circuit-breakers, disconnect switches, and H-frame structures for stringing conductors would be required. These improvements would be located within the confines of the existing switchyard.

Figure 4 shows the proposed project components.

1.5.2 Project Construction

Construction of the proposed CCGS is estimated to take approximately 3.5 years to complete, starting in early 2026 and continuing to mid-2029. Commissioning of the CCGS would occur concurrently with the final year of construction as individual elements of the CCGS are completed. However, this would be followed by an approximately 6-month period during which the operation of the CCGS and associated systems would be tested, verified for reliability, and adjusted as necessary. After this process, which would be completed by the end of 2029, Units 1 and 2 would be removed from service. The connection to the OTC system would then be physically and permanently severed within the boundaries of Scattergood.

Other than the delivery of fill material and construction components to the site, the hauling of debris from the site, and the potential installation of a dedicated wastewater line to Hyperion WRP within Vista Del Mar, construction activities would generally be confined to the boundaries of Scattergood. The generation unit components would be delivered to the site on trucks, and some oversize loads are anticipated. 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. Contractors and LADWP would require temporary buildings for construction management activities and warehousing, which would be accommodated in this area. Additional materials storage areas may also be required on leased property outside the boundaries of Scattergood. The soil stockpile located at the western end of the southern parcel would be used to the extent feasible as fill material required for the project.

In addition to the actual CCGS and ancillary facilities construction, major activities would include the construction of retaining walls; backfilling the site of the proposed CCGS, which would require approximately 120,000 cubic yards of material; modifying the in-station wastewater discharge and stormwater collection systems; potentially constructing a wastewater line to Hyperion WRP within Vista Del Mar; and severing the OTC system.

During the peak of construction activity, it is currently anticipated that the number of on-site daily workers would generally range between 200 and 300 and more than 300 for short durations. During the peak of activity, the number of on-site daily construction equipment would generally range between 40 and 60 and more than 60 for short durations. The peak number of daily off-site truck trips would be approximately 40 for several months during the backfilling of the proposed CCGS site.

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

Proposed Project Components

Figure 4

1.5.3 Project Operations

Within 6 months of completion of the commissioning of the proposed project CCGS, LADWP would remove existing Units 1 and 2 from service and surrender the operating permits pursuant to SCAQMD Rule 2012.

As discussed above, LADWP's in-basin combustion-turbine generators currently provide a substantial proportion of the City's energy on a daily and annual basis. However, as the City reaches its goal of a carbon-free energy system, the in-basin combustion turbines would be operated infrequently, only to meet rare critical peaks in daily demand that exceed renewable energy production or during relatively short-term periods when renewable generation sources may become unavailable due to emergency circumstances. In this manner, the combustion turbines would provide local generation capability that is crucial to maintaining the reliability and resilience of the LADWP power system and preventing the potential collapse of the grid.

With the implementation of expanded renewable generation resources, improvements to transmission assets, increased energy storage, and other elements of the LADWP carbon-free energy system outlined in the SLTRP, the in-basin combustion units are anticipated to be utilized primarily for backup power generation. Therefore, it is anticipated that the proposed project CCGS would be operated at a low capacity factor (i.e., the ratio of actual generation output to the potential capacity of the generation unit) compared to similar units in service today. This reduced capacity factor is based on a conservative assumption that LADWP's renewable energy resources will provide 60 percent of its electrical generation capacity by 2030, as mandated under California Senate Bill 100 (2018). The 2022 Draft SLTRP preferred case establishes a goal of 80 percent renewable resources, and as of 2021, an estimated 37 percent of LADWP's power resources were eligible renewable energy resources, a figure that excludes certain existing clean energy resources, such as large hydroelectric and nuclear generation. Based on the planning assumptions in the SLTRP, it is anticipated that the annual capacity factor for the proposed CCGS would further reduce as additional renewable energy resources come online to serve load within the LADWP system. This proposed capacity factor would be substantially lower than the 2022 annual capacity factor for Scattergood of approximately 27.5 percent and the average annual capacity factor for the past six operating years of approximately 25.5 percent. This very low frequency of operations would apply to the proposed project CCGS on an annual basis, but the unit would be run at higher capacities on a daily basis during relatively brief peak use periods.

As discussed above, potable water is currently used at Scattergood primarily for makeup water to compensate for losses associated with reverse osmosis/demineralization, blowdown, evaporation, and other processes. Although the Units 1 and 2 steam boilers, which use large volumes of makeup water, would be removed from service concurrent with the implementation of the proposed project, the proposed CCGS, including the HRSG/ACC steam loop, would also require relatively large volumes of makeup water. However, while the majority of the process water at Scattergood is potable water under current operations, under the proposed project, the use of recycled water would be substantially increased from internal sources through the reuse of industrial process water and a currently planned increase from external sources by maximizing supplies from the Edward C. Little Water Recycling Facility consistent with the limits of existing infrastructure and/or obtaining new supplies from Hyperion WRP. Therefore, it is anticipated that the proposed project would reduce the consumption of potable water for all functions at Scattergood compared to current operations.

In addition, because the proposed project CCGS as well as all generation units at Scattergood are anticipated to be operated infrequently compared to existing operations, the consumption of water and the use of chemicals, including aqueous ammonia, would be reduced proportionally on an annual basis. Similarly, the generation of industrial wastewater associated with the operation of the proposed project would also be reduced on an annual basis.

The proposed project would not require additional personnel beyond those currently employed at Scattergood to support operations.

2 ENVIRONMENTAL DETERMINATION

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2023) to determine if the proposed project may have a significant effect on the environment.

CEQA INITIAL STUDY FORM

Project Title:
Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project

Lead Agency Name and Address:
Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Contact Person and Phone Number:
Jazmin Martin
Environmental Planning and Assessment
Los Angeles Department of Water and Power
(213) 367-1768

Project Sponsor's Name and Address:
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

City Council District:
11th District – Councilmember Traci Park

Neighborhood Council:
Westchester-Playa

Project Location:
The proposed project would be 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. All permanent operational facilities (i.e., generation units and ancillary functions) at Scattergood are located in the northern parcel (north of Grand Avenue).

General Plan Designation:
The proposed project site has a general plan designation of Public Facilities.

Zoning:
The proposed project site is zoned as PF-1 (Public Facilities).

Description of Project:
LADWP proposes to construct and operate a rapid-response CCGS at Scattergood. The CCGS would be capable of operating on a fuel mixture of natural gas and a minimum of 30 percent hydrogen gas. This hydrogen-ready capability would allow LADWP to begin the conversion from

natural gas to green hydrogen in its in-basin combustion-turbine generation system as the department transitions to a carbon-free electrical energy system. The proposed project would replace the generation capacity of existing Scattergood Units 1 and 2, which are conventional natural-gas-fired steam-boiler electric generators that will be removed from service. When compared to the existing steam-boiler Units 1 and 2, the CCGS would substantially increase fuel efficiency, thereby also reducing the emission of air pollutants and GHGs relative to the amount of energy produced. The CCGS would be fully operational by the end of 2029.

Surrounding Land Uses and Setting:
Dockweiler State Beach is located to the west of Scattergood and Vista Del Mar. The approximately 120-acre Hyperion WRP, located within the City of Los Angeles, is adjacent to Scattergood on the north. The City of El Segundo borders Scattergood on the northeast, east, and south. Residential neighborhoods within El Segundo are located to the northeast and east, and the approximately 1.5-square-mile Chevron El Segundo Refinery is adjacent to the south. Land uses within 0.5 miles of Scattergood include additional residential neighborhoods; commercial establishments; elementary, middle, and high schools; public parks; and government buildings. The El Segundo Energy Center, a 560-MW natural-gas-fired generating station, is located approximately 0.4 miles south of Scattergood along the west side of Vista Del Mar. LAX, located within the City of Los Angeles, is approximately 0.75 miles north of Scattergood.

2.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☒ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☒ Utilities and Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

2.2 Environmental Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

May 3, 2023
Date

Jane Hauptman
Manager of Environmental Planning and Assessment
Los Angeles Department of Water and Power

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3 ENVIRONMENTAL IMPACT ASSESSMENT

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

a) Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. Scenic vistas are generally defined as panoramic public views to various natural features, including large water bodies or striking or unusual natural terrain.

The proposed project facilities would be located entirely within the boundaries of Scattergood, which includes a number of existing large electrical generating units with exhaust stacks, an electrical switchyard and transmission towers, aboveground storage tanks, and other ancillary facilities that support the power generation functions at the station. These facilities impart an entirely industrial character to the property. Surrounding land uses include Dockweiler State Beach located to the west, the 120-acre Hyperion WRP to the north, residential neighborhoods within El Segundo to the northeast and east, and the 1.5-square-mile Chevron El Segundo Refinery to the south.

The proposed CCGS would be located in the southwest corner of the northern parcel of Scattergood, on an approximately 3-acre site on the lower terrace previously occupied by Scattergood Generation Unit 3, which was demolished in 2018. It would be sited adjacent to existing generating facilities, and it would be visually similar in character and scale and be located largely within the visual profile of these facilities. Scattergood rises in elevation from west to east, which tends to obscure facilities located on lower (westernmost) terrace from viewpoints east of the station. However, because the proposed project facilities would be visible from Dockweiler State Beach, albeit within the context of the existing generating station, the impact on scenic vistas is considered potentially significant, and this issue will be further analyzed in the EIR.

b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no state-designated scenic highways in the vicinity of the project site.[5] Vista Del Mar between Culver Boulevard and Imperial Highway is a City-designated scenic highway in the project vicinity that features sand dunes and ocean views.[6] However, Scattergood is located approximately 1 mile south this segment of Vista Del Mar. The proposed project would not require removal of, or impact views of, any scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway or a locally designated scenic highway. No impact would occur, and this issue will not be further analyzed in the EIR.

c) Except as provided in Public Resources Code Section 21099, would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The proposed project facilities would be located in a fully urbanized area of the City of Los Angeles, entirely within the existing boundaries of Scattergood and would be visually similar in character and scale to existing facilities and be located largely within the visual profile of these facilities. Consistent with its long-standing use as an electrical generating station, Scattergood has a General Plan land use designation of Public Facilities and is zoned PF-1 (Public Facilities). Although Scattergood is adjacent to Dockweiler State Beach, the station is excluded from the Coastal Zone per Section 30166(c) of Chapter 2.5 of the California Coastal Act (Division 20, California Public Resources Code). Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality. No impact would occur, and this issue will not be further analyzed in the EIR.

d) Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The proposed project facilities would include lighting similar to existing lighting at Scattergood, which is required for operations, security, and the safety of facility personnel. However, based on the existing level of lighting at the station and the scale of the proposed project facilities compared with existing facilities, lighting associated with the project would not create a new source of substantial light or glare that would adversely affect nighttime views in the area. In addition, because the proposed structures would be similar in scale and materials to existing structures at Scattergood, the proposed project would not introduce substantial new sources of glare. Therefore, impacts related to substantial light or glare would be less than significant, and this issue will not be further analyzed in the EIR.

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5 California Department of Transportation. State Scenic Highway Program – Scenic Highway System Lists. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed November 20, 2022.

6 City of Los Angeles Department of City Planning. September 2016. *Mobility Plan 2035, An Element of the General Plan*. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. Accessed November 20, 2022.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. According to the California Important Farmland Finder maintained by the California Department of Conservation, the project site and vicinity are designated as Urban and Built-Up Land.[7] Urban and Built-Up Land indicates that the land is used for residential, industrial, commercial, and other developed purposes. The proposed project would not be located on or near Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the project would not convert Farmland to a non-agricultural use. No impact to farmland would

[7] California Department of Conservation, Division of Land Resource Protection. 2018. Farmland Mapping & Monitoring Program, California Important Farmland Finder. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed October 2022.

occur, and this issue will not be further analyzed in the EIR.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act enables local governments to enter contracts with private landowners to restrict specific parcels of land to agricultural or related open space use in exchange for reduced property tax assessments for the landowners. There are no existing Williamson Act contracts within Los Angeles County.[8] The proposed project would be located on land with a general plan and zoning designation of Public Facilities. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur, and this issue will not be further analyzed in the EIR.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The proposed project would be located within a fully urbanized area of the City of Los Angeles, and the project site is zoned PF-1 (Public Facilities) under the City's zoning code.[9] Therefore, the project site is not developed as or zoned for forest land or timberland. As such, the proposed project would not conflict with existing zoning for or cause a rezoning of forest or timberland. No impact would occur, and this issue will not be further analyzed in the EIR.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The proposed project site is located within a fully developed industrial facility devoted to the generation of electrical power. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur, and this issue will not be further analyzed in the EIR.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The proposed project would be located within a fully urbanized area of the City of Los Angeles. There are no areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on or near the project site, and no forest lands exist within the vicinity of the project site. Therefore, the proposed project would not change the existing environment in a way that would result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. No impact would occur, and this issue will not be further analyzed in the EIR.

[8] California Department of Conservation. 2022. The Williamson Act Status Report 2020-21. Available at: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf. Accessed October 2022.

[9] City of Los Angeles Zoning Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed November 2022.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☒	☐	☐	☐

Discussion

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The South Coast Air Quality Management District (SCAQMD) is the agency responsible for regulating air quality for areas of Los Angeles, Orange, Riverside, and San Bernardino Counties. SCAQMD's Air Quality Management Plan (AQMP) is a regional plan for achieving air quality standards and healthful air within the SCAQMD jurisdictional boundaries. The City of Los Angeles, including the project site, is located within the South Coast Air Basin, which is a defined geographic sub-region within the SCAQMD's jurisdiction.

Construction activity associated with the proposed project is not anticipated to violate AQMP land use growth assumptions or increase the frequency of air quality violations. Operation of the proposed CCGS would use a combination of processes to control air pollutant emissions to maintain consistency with the AQMP. Nonetheless, because the construction and operation of the proposed project would create air pollutant emissions, the impact is considered potentially significant, and this issue will be further analyzed in the EIR.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. The Los Angeles County portion of the South Coast Air Basin is presently designated as nonattainment under federal and/or state ambient air quality standards for ozone and inhalable particulate matter 10 microns or less in diameter, including fine particulate matter 2.5 microns or less in diameter. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. The SCAQMD has published guidance addressing the evaluation of potential cumulative impacts for CEQA projects. According to this guidance, if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, those emissions would also be considered cumulatively significant. For this reason, the SCAQMD applies the same project-level thresholds

to cumulative assessments. Conversely, if construction or operation of a project would not generate emissions of sufficient quantity to exceed any of the applicable mass daily thresholds, then that project and its associated emissions would be considered less than significant in the cumulative context.

Construction of the proposed project would generate short-term criteria air pollutants related primarily to the operation of equipment and vehicles. Operation of the proposed project would produce long-term criteria air pollutants, similar to existing conditions, related to emissions from the combustion-turbine generator. The impact is considered potentially significant, and this issue will be further analyzed in the EIR.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors, which include children and the elderly, are defined persons that are more susceptible to the harmful health effects of emissions. Sensitive receptor locations within the project vicinity may include residential areas, elder care facilities, and schools. The greatest potential for toxic air contaminants affecting sensitive receptors during construction would be from diesel particulate emissions associated with heavy equipment operations. Toxic air contaminants during project operation would be primarily from the emissions from the combustion-turbine generator that would be discharged to the atmosphere via the exhaust stack. As such, impacts regarding the exposure of sensitive receptors to substantial pollutant concentrations are considered potentially significant, and this issue will be further analyzed in the EIR.

d) Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Potentially Significant Impact. A significant impact would occur if construction activities would result in the creation of nuisance odors that would be noxious to a substantial number of people, or visible dust plumes. Potential sources that may produce objectionable odors during construction include equipment exhaust and the application of asphalt and architectural coatings. Although odors related to construction would be temporary in nature, they may be detected on properties surrounding the project site. Thus, the impact is considered potentially significant, and this issue will be further analyzed in the EIR.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

Potential impacts to biological resources associated with the proposed project were determined from the results presented in the Biological Resources Assessment prepared for the proposed project, which is included as Appendix A to this Initial Study.

Literature reviews and records searches were conducted to determine which special status biological resources have the potential to occur on or within the general vicinity of Scattergood. A field survey was conducted on December 12, 2022, to document existing conditions and determine the potential for special-status plant and wildlife species to occur within Scattergood.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A significant impact could occur if the proposed project removed or modified the habitat for, or otherwise directly or indirectly affected, any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

The survey area consists of land mapped as urban/developed and disturbed. This includes the generation facilities, parking lots, roads, and other buildings and structures, including residential neighborhoods adjacent to Scattergood. These areas have been constructed upon or physically altered to a degree that natural soil substrates and native vegetation communities are no longer supported. Ornamental vegetation is planted throughout the survey area. There are no natural vegetation communities within the entire Scattergood property. Instead, ground cover consists primarily of urban/developed areas with limited areas of ornamental vegetation.

The vegetation community occurring within the survey area consist primarily of non-native species and was interspersed with few commonly occurring native species. Non-native species observed consisted of hottentot fig (*Carpobrotus edulis*), acacia (*Acacia sp.*), Mexican fan palm (*Washingtonia robusta*), Eucalyptus (*Eucalyptus sp.*), ripgut brome (*Bromus rigidus*), slender oats (*Avena barbata*), red-stemmed filaree (*Erodium cicutarium*), and other non-native grasses. Observed native species consisted of telegraph weed (*Heterotheca grandiflora*) and deerweed (*Acmispon glaber*).

Special Status Plant and Wildlife Species

The California Natural Diversity Database (CNDDB),[10] California Native Plant Society Inventory of Rare and Endangered Plants of California (CIRP),[11] and Information for Planning and Consultation project planning tool (IPaC)[12] were queried for reported locations of special-status plant and wildlife species as well as special-status natural vegetation communities in the U.S. Geological Survey Venice, Inglewood, Torrance, and Redondo Beach, California 7.5-minute quadrangles, covering a land area of approximately 170 square miles.

Forty-five special-status plant species and twenty-eight special-status wildlife species were identified during the database review. No special-status plants or special-status wildlife species 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, occurrence records, known distributions, and elevation ranges, it was determined that with the exception of the El Segundo blue butterfly (ESB) discussed further below, none of the special-status plant and wildlife species identified by the CNDDB, CIRP, and IPaC are expected to occur within the survey area. As a result, there

[10] California Department of Fish and Wildlife. 2023. RareFind 5, California Natural Diversity Database, California. Database report on threatened, endangered, rare or otherwise sensitive species and communities for the USGS Venice, Inglewood, Torrance, and Redondo Beach, California 7.5-minute quadrangles.

[11] California Native Plant Society. 2023. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.5). Available at: http://www.rareplants.cnps.org/. Accessed January 2023.

[12] U.S. Fish and Wildlife Service. 2023. IPaC Information for Planning and Consultation. Available at: https://ecos.fws.gov/ipac/. Accessed January 2023.

would be no impacts to special-status plants or special-status wildlife species during project construction or operation, and this issue will not be analyzed further in the EIR.

El Segundo Blue Butterfly

The El Segundo blue butterfly (*Euphilotes battoides allyni*) is a federally listed endangered butterfly that spends virtually its entire life cycle in intimate associations with the flower heads of the seacliff or coast buckwheat (*Eriogonum parviflorum*), which is found within and along the coastal dunes. Scattergood is bordered to the south by the Chevron El Segundo Refinery. Approximately 2 acres of the refinery, located adjacent to the southeast corner of the southern parcel of Scattergood, is designated as an ESB habitat preserve.

As a known ESB population occurs within close proximity to Scattergood, an ESB habitat assessment was performed. The vegetation community within the northern parcel of Scattergood consists primarily of non-native species, non-native grasses, and a few commonly occurring native plants, as described above. No coast buckwheat (i.e., ESB habitat) was observed at any location in the northern parcel of Scattergood. The southern parcel of Scattergood, located directly west of the Chevron El Segundo Refinery habitat preserve, consists of gravel-paved areas and soil stockpiles. Plant species include non-native species, non-native grasses, acacia, and hottentot fig. No coast buckwheat was observed, and thus, no suitable ESB habitat would be impacted by the proposed project. Therefore, impacts to ESB would be less than significant, and this issue will not be further analyzed in the EIR.

Nesting Birds

Nesting birds are protected pursuant to the federal Migratory Bird Treaty Act of 1918 and the California Fish and Game Code. To maintain compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, 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.

A total of six 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*). 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. Trees are not located within the footprint of the proposed project facilities; therefore, no trees would be removed for the project, and no direct impacts would occur. Indirect impacts to nesting birds within the survey area could occur as a result of noise, increased human presence, and vibrations resulting from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. 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, Best Management Practice (BMP)-1, as follows, should be implemented during project construction. With implementation of BMP-1, indirect impacts to nesting birds would be less than significant, and this issue will not be further analyzed in the EIR.

BMP-1: Nesting Bird Surveys

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 any nests found, 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. 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.
    b. 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.
    c. 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.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Three special-status vegetation communities were identified during the review of the CNDDB from the U.S. Geological Survey Venice, Inglewood, Torrance, and Redondo Beach California 7.5-minute quadrangles and in the IPaC for the project region. However, the project survey area consists of land mapped as urban/developed and disturbed. This includes the generation facilities, parking lots, roads, and other buildings and structures, including residential neighborhoods adjacent to Scattergood. These areas have been constructed upon or physically altered to a degree that natural soil substrates and native vegetation are no longer supported. Ornamental vegetation is planted throughout the survey area. No natural vegetation communities occur within the entire Scattergood property. Instead, ground cover consists primarily of urban/developed areas and limited areas of ornamental vegetation. There is no riparian habitat within Scattergood. Therefore, implementation of the proposed would not impact any riparian habitat or other sensitive natural community. No impact would occur, and this issue will not be further analyzed in the EIR.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Based on a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, there are no wetlands within the Scattergood property and a 100-foot buffer around the property. Additionally, no potential jurisdictional drainages or wetland features were observed within the boundaries of the survey area. The proposed project would not have a substantial adverse effect on state or federally protected wetlands. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The Scattergood property is not located within any wildlife corridors. The survey area 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 minimal to no opportunities for movement of wildlife. 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. Elevated noise levels, vehicle traffic, lighting, and human presence associated with the residential and industrial developments and roadways also decrease the suitability of the survey area to be used as a wildlife movement corridor or linkage. The proposed project would be located entirely within the boundaries of Scattergood, and thus, would not interfere with the movement of any wildlife species, wildlife corridors, or impede the use of nursery sites. As discussed above in Section 3.4(a), Scattergood does not act as a wildlife corridor or wildlife nursery for the ESB. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The entire Scattergood property is composed of urban/developed land. No vegetation communities or other land cover types and no significant biological resources occur on-site. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur, and this issue will not be further analyzed in the EIR.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No adopted Habitat Conservation or Natural Community Conservation Plans coincide with the boundaries of the Scattergood property and a 100-foot buffer around the property.[13] Additionally, though Scattergood is adjacent to the Pacific Ocean, the site itself is not

[13] California Department of Fish and Wildlife. Natural Community Conservation Plans, Map. Available at: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/. Accessed January 2023.

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). Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Discussion

Potential impacts related to cultural resources resulting from implementation of the proposed project were determined from the results presented in the Cultural and Paleontological Resources Identification Report prepared for the proposed project, which is included as Appendix B to this Initial Study.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. CEQA Section 15064.5 states that historical resources are "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource." In addition, "a resource is 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources and:

> (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
>
> (B) Is associated with the lives of persons important in our past;
>
> (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
>
> (D) Has yielded, or may be likely to yield, information important in prehistory or history."

A cultural resource determined to meet one or more of the above criteria is considered a historical resource under CEQA. In addition, historical resources eligible for listing in the California Register of Historical Resources (CRHR) must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Cultural resources identification methods for the proposed project included a review of South Central Coastal Information Center records search, archival research, literature review,

historical map and aerial photograph review, and archaeological site sensitivity analysis. The records search included a project study area identified as the southern portion of Los Angeles County Assessor Parcel Number 4131-028-900 and all of Assessor Parcel Numbers 4131-027-901 and 4131-027-900, (which encompasses the Scattergood property) and a half-mile radius around Scattergood. A vertical depth 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. As part of the records search, the following federal and California inventories were reviewed: National Register of Historic Places, Archaeological Resources Directory for Los Angeles County, Built Environment Resource Directory for Los Angeles County, and California Historical Resources. In addition to the studies documented at the South Central Coastal Information Center, an additional study on file with LADWP was reviewed; it includes archaeological and built environment surveys of study area.

The records search indicated that 14 studies have taken place within the 0.5-mile study area. Of the 14 previous studies, three were completed within Scattergood. Scattergood itself and one resource within the 0.5-mile study area but outside the area of impact of the proposed project, the El Segundo Power Generating Station, have been documented.

When initially documented in 2011, Scattergood consisted of several 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. Additionally, the generating station included Unit 3, which was constructed in 1974 and demolished circa 2017-2018. The other surviving structures at Scattergood not mentioned above are not historic in age. Scattergood was recommended ineligible for inclusion in the CRHR in 2011 and is not a historical resource as defined by CEQA Section 15064.5(a). Additionally, the El Segundo Power Generating Station was found ineligible through survey evaluation. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact. The South Central Coastal Information Center records search, literature review, and map review identified no archaeological resources, as defined by CEQA Section 15064.5, within Scattergood. The site of Scattergood was previously occupied by aeolian sand dunes, with the closest source of freshwater approximately 3.25 miles to the north; the natural soils in this area would have been impacted by continual erosion and deposition mixing events typical of aeolian sand dunes; thus, the preservation of archaeological sites would be highly unlikely. Additionally, ethnographic research does not indicate any villages or named places within or near the project site. The project site is now located on an artificially flat area composed of fill soils. Fill soils typically have little to no sensitivity for significant or potentially significant archaeological resources because the soils are not within their primary context. Due to past disturbance from the development of facilities at Scattergood, the project site has very low to no sensitivity for significant prehistoric or historic period archaeological resources. Therefore, impacts related to archaeological resources would be less than significant, and this issue will not be further analyzed in the EIR.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. There are no cemeteries or known burial grounds located within Scattergood. Based on the results of the archival research, there is low potential for such sites to be encountered during ground-disturbing activities. Moreover, past construction activities have disturbed the entire property. The likelihood of encountering undisturbed soils that may contain human remains is considered highly unlikely.

However, while not expected to occur, in the event that human remains are discovered, the remains would be treated in accordance with all applicable regulations. In accordance with the provisions of the California Health and Safety Code Section 7050.5, in the event that human remains are discovered during project construction, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains would occur, and the Los Angeles County Coroner would be notified. The coroner would provide recommendations concerning the treatment and disposition of the human remains within two working days. If the remains and/or any related resources are determined to be of Native American origin, the coroner would contact the California Native American Heritage Commission within 24 hours. In accordance with California Public Resources Code Section 5097.98, the California Native American Heritage Commission would notify the person it believes to be most likely descended from the deceased Native American. The most likely descendent would be given access to the site where the remains were discovered and may make recommendations for the treatment and disposition of the remains and any related resources, as well as provide input regarding the potential for other remains to be present. Work at the discovery site may commence only after consultation with the most likely descendent and treatment of the remains and any associated resources have been concluded. Work may continue on other parts of the project site while consultation and treatment are conducted. With adherence to existing regulations, impacts related to human remains would be less than significant, and this issue will not be further analyzed in the EIR.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Energy resources required for construction of the proposed project would include electricity for construction trailers and electrically powered tools and equipment. Electricity would be provided through a connection to the LADWP grid. The electricity consumed for construction activities would be temporary and relatively minimal, and, therefore, would not be considered wasteful, inefficient, or unnecessary. The use of petroleum resources during construction would include gasoline for on-road vehicles and diesel fuel for heavy duty on-road trucks and off-road equipment. The primary petroleum resource consumed during construction would be diesel fuel. The proposed project would be subject to California Air Resources Board's In-Use Off-Road Diesel Vehicle Regulation, which applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation imposes limits on idling and requires a written idling policy; requires all vehicles to be reported to the California Air Resources Board (using the Diesel Off-Road Online Reporting System) and labeled; restricts the adding of older vehicles into fleets starting on January 1, 2014; and requires reductions in fleet emissions by retiring, replacing, or repowering older engines, or installing verified diesel emission control strategies (i.e., exhaust retrofits). It must be demonstrated that the fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the best achievable control technology (BACT) requirements. Because the proposed project construction would be temporary and would comply with these energy efficiency standards and would not be unusual compared to overall local and regional demand for energy resources, construction would not result in wasteful, inefficient, or unnecessary consumption of petroleum. The impact during proposed project construction would be less than significant, and this issue will not be further analyzed in the EIR.

As discussed in Section 1.4 of the Initial Study, the proposed CCGS would consist of a combustion-turbine generator and a steam-turbine generator operating in tandem. This would substantially increase the fuel efficiency of electrical power production compared to the existing steam-boiler Units 1 and 2. In addition, the proposed CCGS would be utilized only to meet rare critical peaks in daily demand that exceed the available supply provided by renewable-energy generation resources, or during relatively short-term periods when renewable generation sources may become unavailable due to emergency circumstances (e.g., the temporary loss of critical renewable energy transmission lines caused by wildfire or earthquake). It is anticipated that the CCGS would be operated at a low capacity factor when compared to similar units in service today. Based on the planning assumptions in the SLTRP, it is anticipated that the

annual capacity factor for the proposed CCGS would further reduce as additional renewable resources come online to serve load within the LADWP system. This proposed capacity factor, necessary to maintain the reliability and resilience of the City's electrical power grid, would be lower than the 2022 annual capacity factor for Scattergood of approximately 27.5 percent and the average annual capacity factor for the past six operating years of approximately 25.5 percent. Therefore, the proposed project wound not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation. The impact would be less than significant, and this issue will not be further analyzed in the EIR.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. As discussed above, the primary component of the proposed project is the proposed CCGS, which would substantially increase the fuel efficiency of electrical power production compared to the existing steam-boiler Units 1 and 2. Additionally, as discussed above in Section 1.1, the proposed project is an integral component of LADWP's electrical power SLTRP, which establishes the pathway to achieve a carbon-free energy system for the City by 2035, relying primarily on renewable solar, wind, and geothermal generation resources as well as large-capacity energy storage facilities. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur, and this issue will not be further analyzed in the EIR.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. Two major active earthquake fault zones and several smaller earthquake faults are located within the general region of Scattergood. The Palos Verdes Fault Zone is located offshore approximately 3.5 miles southwest of the station at its nearest point.

The Newport-Inglewood Fault Zone is located approximately 5.5 miles northeast of the station at its nearest point. However, the project site is not located within an Alquist-Priolo Earthquake Fault Zone or other known fault zone.[14,15] The proposed project facilities would be designed and constructed in compliance with the latest version of the City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. Furthermore, a site-specific geotechnical analysis for the project site would be prepared prior to construction to provide design recommendations related to seismic criteria. Therefore, impacts related to potential adverse effects from the rupture of a known earthquake fault would be less than significant, and this issue will not be further analyzed in the EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is located within a seismically active region, and as with all locations in Southern California, is potentially subject to strong seismic ground shaking. However, as discussed in Section 3.7(a)(i) above, the proposed project facilities would be designed and constructed in compliance with the latest version of the City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to seismic ground shaking. Furthermore, a site-specific geotechnical analysis for the project site would be prepared prior to construction to provide design recommendations related to seismic criteria. Therefore, impacts related to strong seismic ground shaking would be less than significant, and this issue will not be further analyzed in the EIR.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction occurs when loosely packed, water saturated sediments at or near the ground surface lose their strength in response to strong or extended periods of seismic shaking. Liquefied sediments lose strength, in turn causing the failure of adjacent structures. The project site is not located within a City designated liquefaction area.[16] No impact would occur, and this issue will not be further analyzed in the EIR.

iv. Landslides?

Less Than Significant Impact. Portions of the project site are identified on maps as a potential landslide hazard area.[17] However, as part of the Scattergood Unit 3 Repowering Project, geotechnical investigations were undertaken and portions of the slope within the landslide hazard area were modified with the construction of retaining walls, which eliminated the potential for seismically induced slope failure. Similarly, the proposed project would utilize retaining walls to reduce any impacts related to landslides. A site-specific geotechnical analysis would also be prepared prior to construction to provide project design recommendations in accordance with all applicable local, state, and federal codes related to seismic criteria. Therefore, impacts related to landslides would be less than significant and this issue will not be further analyzed in the EIR.

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14 California Department of Conservation. CGS Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones. Available at: https://gis.data.ca.gov/maps/ee92a5f9f4ee4ec5aa731d3245ed9f53/about. Accessed November 2022.

15 U.S. Geologic Survey. Quaternary Fault and Fold Database of the United States. Interactive Map. Available at: https://doi.org/10.5066/F7S75FJM. Accessed November 2022.

16 City of Los Angeles. ZIMAS. Available at: http://zimas.lacity.org/. Accessed November 2022.

17 City of Los Angeles GeoHub, Landslides. Available at: https://geohub.lacity.org/datasets/lacounty::landslide-zones/explore?location=33.913899%2C-118.417458%2C16.00. Accessed March 2023.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the proposed project would result in ground surface disturbance during excavation and grading that could create the potential for erosion to occur. However, during construction, transport of sediments by stormwater runoff and wind would be prevented through BMPs, such as implementation of Rule 403 dust control measures required by the SCAQMD and a Stormwater Pollution Prevention Plan (SWPPP) for construction activities in compliance with the latest Los Angeles Regional Water Quality Control Board's National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges. Therefore, the proposed project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed in Section 3.7(a)(iv), a portion of Scattergood is identified on maps as a potential landslide hazard area. However, with implementation of project design features such as retaining walls, as well as adherence to existing regulations and the recommendations in the pre-construction geotechnical analysis that would be prepared prior to construction, impacts related to landslides would be less than significant.

Subsidence is the lowering of surface elevation due to the extraction of subsurface fluids, such as groundwater. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. No groundwater extraction would occur as part of the proposed project. Therefore, impacts related to subsidence would not occur.

Lateral spreading is a type of liquefaction-induced ground failure on mildly sloping ground. The project site is not located within a City designated liquefaction area. As previously discussed, a geotechnical analysis would be conducted for the proposed project prior to construction. All project components would be designed based on the analysis related to soil conditions and would be constructed in accordance with all applicable local, state, and federal codes related to seismic criteria. Therefore, impacts related to unstable soils would be less than significant, and this issue will not be further analyzed in the EIR.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur. According to the U.S. Department of Agriculture's Web Soil Survey, the geologic materials underlying the project site are described as mostly industrial with a small percentage of loamy soil, which are not highly

susceptible to expansion.[18, 19] Additionally, as previously discussed, the proposed project would be designed and constructed in accordance with the recommendations of the site specific geotechnical analysis as well as in accordance with all applicable local, state, and federal codes. No impact would occur, and this issue will not be further analyzed in the EIR.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Sanitary wastewater at Scattergood is handled through a connection to the existing sanitary sewer system. No septic tanks or alternative wastewater disposal systems are proposed as part of the project. No impact would occur, and this issue will not be further analyzed in the EIR.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. The soil at the project site has been mapped as Urban Land, which indicates an area predominantly covered by urban development features, such as streets, parking lots, buildings, and other structures.[20] A previous study of the project site indicated that Holocene deposits near the surface have been stripped away by past construction activities.[21] Additional field research and archival research using the Natural History Museum of Los Angeles County, University of California Museum of Paleontology Locality Search, San Diego Natural History Museum Collection Database, the Paleobiology Database, and FAUNMAP identified no fossil localities within the project site. Seven localities from similar sedimentary deposits as the project site, either at the surface or at depth, were identified between 0.6 and 3.75 miles from the project site. This indicates that fossil-bearing geologic units are present in the vicinity of the project site, potentially including the highly sensitive Palos Verdes Sands and San Pedro Formation.

While the disturbed industrial urban soils at the project site have a low sensitivity, Pleistocene-age alluvial sediments are anticipated to underlie recent fill. The Pleistocene-age sediments are considered to have a high sensitivity for paleontological resources. Excavation activities during construction of the proposed project may disturb Pleistocene sediments and have the potential to directly or indirectly destroy the paleontological resource. Therefore, a significant impact to paleontological resources could result during ground-disturbing activities. Implementation of Mitigation Measure (MM) GEO-1, requiring paleontological monitoring during ground-disturbance in undisturbed geologic contexts, would ensure that construction activities for the proposed project would not directly or indirectly destroy a unique paleontological resource, paleontological site, or geologic feature. With implementation of MM GEO-1, impacts to paleontological resources during construction would be less than significant, and this issue

[18] California Department of Conservation. Compilation of Quaternary Surficial Deposits Map. Available at: https://maps.conservation.ca.gov/cgs/QSD/. Accessed November 2022.

[19] U.S. Department of Agriculture. Natural Resources Conservation Service. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed November 2022.

[20] Natural Resources Conservation Service. 2022. Web-based soil mapping interface. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed October 2022.

[21] Austerman, Gini, and Jim Rudolph. 2011. Scattergood Generating Station Unit 3 Repowering Project Cultural Resources Survey Report, City of Los Angeles, Los Angeles County, California. Report prepared by POWER Engineers for Los Angeles Department of Water and Power.

will not be further analyzed in the EIR.

MM GEO-1 **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.

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 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 SVP-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, cataloged, and 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, 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).

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Discussion

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. The proposed project would generate greenhouse gas (GHG) emissions during temporary construction activities and long-term operations. Construction would result in short-term GHG emissions produced by construction equipment exhaust as well as on-road truck and other vehicle trips. Operation of the CCGS would result in GHG emissions from the combustion of natural gas. This impact is considered potentially significant, and this issue will be further analyzed in the EIR.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As discussed in Section 3.8(a), the proposed project would emit GHGs during temporary construction activities and long-term operations, which may conflict with GHG strategies and targets of applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the impact is considered potentially significant, and this issue will be further analyzed in the EIR.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction activities would involve the temporary transport, storage, and use of hazardous materials, such as fuels and lubricating fluids for construction equipment. In addition, during construction of the proposed project, paints, solvents, and other potentially hazardous materials may be used. Although these types of materials are not considered acutely hazardous, their storage, handling, and disposal are regulated by the California Department of Toxic Substances Control, U.S. Environmental Protection Agency, the Occupational Safety & Health Administration, and the Los Angeles Fire Department.

The handling of construction-related hazardous materials would occur in conformance with applicable local, state, and federal regulations, including the implementation of a SWPPP, as discussed in Section 3.7(b). Soil sampling would occur in areas of disturbance to analyze for potential contaminants including but not limited to, releases of petroleum fuels, solvents,

lubricants, oils, paints, corrosion inhibitors, asbestos, volatile organic compounds, polycyclic aromatic hydrocarbons, polychlorinated biphenyls, metals, and other hazardous materials under California Code of Regulations Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste. Once the types, characteristics, and quantities of any hazardous substances detected at the project site have been determined, the management and disposition, including transportation, treatment, disposal, or recycling of identified hazardous substances would be in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations. In the event of conflicts between applicable codes, standards, and regulations, the most stringent would apply.

In addition, all hazardous waste would be sent to State licensed treatment, storage, and disposal facilities that have been approved to accept such wastes. The disposal and recycling of wastes would strictly comply with all local, state, and federal laws, rules, and regulations concerning the disposal of all waste substances. Based on the above procedures, the impact related to a significant hazard through the routine transport, use, and disposal of these materials during project construction would be less than significant, and this issue will not be further analyzed in the EIR.

During operation, the proposed project would involve the use of potentially hazardous materials, such as natural gas and aqueous ammonia. Various chemicals may also be required to provide pretreatment for both potable and recycled water used in functions related to operation of the proposed project. The storage, use, and transport of these materials would be similar to current operations at Scattergood, and their use for the proposed project would be generally offset by a similar reduction in use associated with the removal from service of existing Generation Units 1 and 2. In accordance with the Risk Management Plan for Scattergood, all project components would be designed to ensure these hazardous materials would be contained and that such substances would not spill or leak.

The use of hydrogen fuel in the proposed CCGS would introduce a potentially hazardous material not currently in use at Scattergood. Hydrogen differs from the natural gas fuel used at Scattergood in its handling requirements and combustion characteristics. However, the proposed CCGS would be designed to limit embrittlement of metals caused by hydrogen and the degradation of components related to the higher flame temperature of hydrogen.

The storage and use of hazardous materials during operation would comply with local, state, and federal regulations. With adherence to relevant regulations, including the Risk Management Plan, and the application of appropriate design features, the impact related to a significant hazard through the routine transport, use, and handling of hazardous materials during project operation would be less than significant, and this issue will not be further analyzed in the EIR.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. As discussed in Section 3.9(a) above, construction activities would involve the transport, storage, and use of hazardous materials, such as fuels and lubricating fluids for construction equipment. However, these construction-related materials are not considered acutely hazardous, and handling would occur in conformance with applicable local, state, and federal regulations.

While the procedures established in existing regulations would ensure a less than significant impact to the environment under normal conditions during the excavation and removal of potentially contaminated soils, to ensure that reasonably foreseeable and accident conditions are sufficiently responded to, MM-HAZ-1 would be implemented. With implementation of MM-HAZ-1, potential impacts would be less than significant, and this issue will not be further analyzed in the EIR.

MM-HAZ-1 **Accidental Release Plan.** Prior to the initiation of construction activities, an Accidental Release Plan shall be developed and implemented during all activities involving excavation and removal of hazardous materials. The Plan shall include an emergency response plan that establishes procedures for properly managing any accidental hazardous substance releases on the project site. A project-specific Health and Safety Plan shall be prepared in accordance with the Occupational Safety and Health Administration standards and included in the Accidental Release Plan. Copies of the Accidental Release Plan and Health and Safety Plan shall be maintained on site during excavation and removal of hazardous materials from the project site. All workers on the project site shall be familiar with these documents.

As discussed above, the storage, use, and transport of most potentially hazardous materials during project operation, including natural gas, ammonia, and water treatment chemicals, would be similar to current operations at Scattergood, and their use for the proposed project would be offset by a similar reduction in use associated with removal from service of existing Generation Units 1 and 2. All project components would be designed to ensure these hazardous materials would be contained and that such substances would not spill or leak. Therefore, there would be no increase in a hazard through reasonably foreseeable upset and accident conditions related to these materials.

However, the use of hydrogen fuel in the proposed CCGS would introduce a potentially hazardous material not currently in use at Scattergood. Although, the proposed CCGS would be designed to limit embrittlement of metals caused by hydrogen and the degradation of components related to the higher flame temperature of hydrogen, the hazard related to reasonably foreseeable upset and accident conditions is considered a potentially significant impact, and this issue will be further analyzed in the EIR.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. El Segundo Preschool, located in the City of El Segundo, is approximately 0.23 miles east of the eastern border of Scattergood. However, no construction or operational activity for the proposed project would occur within 0.25 miles of the school. The closest project facilities would be located approximately 0.3 miles from the school. No other school is within 0.25 miles of Scattergood. No impact would occur, and this issue will not be further analyzed in the EIR.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. Scattergood is a regulated facility and subject to inspection and reporting by the U.S. Environmental Protection Agency and California Department of Toxic Substances Control. Therefore, it is included on the Department of Toxic Substances Control's EnviroStor database, which includes CORTESE sites, and the U.S. Environmental Protection Agency's database of regulated facilities or other lists compiled pursuant to Section 65962.5 of the Government Code.[22,23] However, there are no previous or current remedial actions associated with the site.[24] Nonetheless, soil underlying the proposed project site may be contaminated. As discussed above in Section 3.9(a), the site would be properly investigated and remediated prior to project construction. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant Impact. The nearest airport to the project site is LAX, located approximately 0.75 miles north of Scattergood. However, the proposed project site is not located within the LAX's Airport Influence Area.[25] Nonetheless, the proposed project would be subject to regulations pertaining to the height of structures on the site as established by the Los Angeles Department of City Planning and the Federal Aviation Administration (FAA). The Los Angeles Department of City Planning establishes a height limit for all structures of 150 feet above a baseline elevation of 126 feet above mean sea level. This means that no structure associated with the proposed project could exceed an elevation of 276 feet above mean sea level without requiring special permit conditions from the Los Angeles Department of City Planning. It is anticipated that the exhaust stack for the CCGS would fall below the elevation requirement for special permit conditions.

Pursuant to Title 14 Code of Federal Regulations Part 77, the FAA requires notification for construction or alteration of a structure that may affect the National Airspace System. Although the proposed CCGS exhaust stack would be lower in height than existing structures at Scattergood, FAA notification would be required because stack may exceed 200 feet in height and is located less than 20,000 feet from a runway. This would be done by completing the Notice of Proposed Construction or Alteration form (FAA Form 7460-1). The FAA would then conduct a review of the proposed structure to determine whether there is a hazard to air navigation and would formally notify LADWP of its findings. The FAA may require markings and/or lighting to enhance the air safety. The FAA notification process is a matter of law and is binding on the applicant. Compliance with the FAA notification process and any requirements

22 California Department of Toxic Substances Control. EnviroStor Database, Search by Map Location. Available at: http://www.envirostor.dtsc.ca.gov/public/. Accessed November 2022.
23 U.S. Environmental Protection Agency. Envirofacts Database. Available at: https://enviro.epa.gov/. Accessed November 2022.
24 California State Water Resources Control Board. GeoTracker Database, Search by Map Location. Available at: http://geotracker.waterboards.ca.gov/map/. Accessed November 2022.
25 Los Angeles County, Airport Land Use Commission. Airport Influence Area. Available at: https://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf. Accessed December 2022.

that the FAA issues in response would ensure the project would not create a safety hazard. In addition, Scattergood is located outside the 65 decibel Community Noise Equivalent Level noise contour for LAX. The project site would continue to be used for industrial uses, similar to existing conditions. Therefore, the proposed project would not expose people working or residing in the area to excessive noise. The impact would be less than significant, and this issue will not be further analyzed in the EIR.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the Los Angeles Police Department and Los Angeles Fire Department, as outlined in the City's Emergency Operations Plan.[26] The County of Los Angeles designates disaster routes within the County. Within the proposed project area, designated disaster routes are State Route 1 and Manchester Avenue, which are approximately 1.5 miles west and 3.0 miles north, respectively, of Scattergood. If a new wastewater pipeline from Scattergood to Hyperion WRP were installed within Vista Del Mar, traffic lane closures would be required during construction. A traffic control plan, as required by the Los Angeles Department of Transportation (LADOT), would be implemented to minimize disruptions to traffic and would ensure adequate emergency access during construction. The lane closures would be temporary, and the roadway would be restored to pre-construction conditions after the pipeline installation was completed. All other construction activity would occur within the existing boundaries of Scattergood. Construction and operation would not alter the adjacent street system such that an adopted emergency response plan or emergency evacuation plan would be impacted. No impact would occur, and this issue will not be further analyzed in the EIR.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The proposed project site is located in an urbanized area surrounded primarily by existing industrial and residential development and is not located within a designated Very High Fire Hazard Severity Zone (VHFHSZ).[27] No construction or operational activity related to the proposed project would create a significant wildfire risk. No impact would occur, and this issue will not be further analyzed in the EIR.

[26] City of Los Angeles. 2018. Emergency Management Department. City of Los Angeles Emergency Operations Plan. Available at: https://emergency.lacity.org/emergency-plans-and-annexes. Accessed November 2022.

[27] Los Angeles Fire Department. Fire Zone Map. Available at: https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map. Accessed on December 2022.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Potentially Significant Impact. As noted previously in Section 3.7(b), construction of the proposed project would result in ground disturbance during excavation and grading that could impact surface or groundwater quality. However, construction activities would comply with NPDES permit requirements, including a project specific SWPPP and associated BMPs. Therefore, the project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater during construction, and construction-related impacts would be less than significant.

The proposed project would change the process for handling industrial wastewater and stormwater runoff at Scattergood. Under existing conditions, industrial wastewater is temporarily stored in holding tanks and discharged at highly diluted concentrations to the ocean via the OTC

system for Units 1 and 2. Stormwater runoff is currently captured in catch basins and treated as necessary in separators or via settlement and discharged through the OTC system. However, after project implementation, the OTC system would no longer be available for the purpose of wastewater and stormwater discharge. Instead, as currently planned under the proposed project, wastewater and stormwater would be captured to the extent possible utilizing the existing wastewater storage tanks located in the southwest corner of Scattergood. This water would then be pumped to the existing process water storage tanks at the east end of Scattergood, from which it would be recycled for use within the generator systems. LADWP is considering various options to address wastewater and stormwater that could not be reused, including the potential for it to be treated at the adjacent Hyperion WRP. As discussed above, this option would entail constructing a dedicated wastewater line in Vista Del Mar from Scattergood to Hyperion WRP as well as reconfiguring the existing wastewater and stormwater collection systems within Scattergood.

While it is anticipated that the quality and quantity of these wastewater and stormwater discharges could be accommodated at Hyperion WRP, further coordination with Hyperion WRP must be conducted. Therefore, the impact is potentially significant, and this issue will be further analyzed in the EIR.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. Project construction would require water for dust control during excavation, grading, and other activities. Water for these activities is anticipated to be supplied from existing water connections and is not anticipated to be substantial. Potable water is currently used at Scattergood and would continue to be used after implementation of the proposed project for various purposes related to the operation of the generation units. However, the use of potable water for the proposed project would be offset by a reduction in use associated with removal from service of existing Generation Units 1 and 2. To further reduce the use of potable water, it is currently planned that the use of recycled water would be expanded under the proposed project through the reuse of industrial process water and from external sources. In addition, because the proposed project CCGS and all generation units at Scattergood are anticipated to only be operated infrequently compared to existing operations, the consumption of water would be reduced proportionally on an annual basis. Therefore, the project would not substantially deplete groundwater supplies nor would it interfere with groundwater recharge such that it may impede sustainable groundwater management plan. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. There are no drainage courses, streams, or rivers that cross the project site, which is fully developed with industrial uses. However, during construction, site grading and excavation activities could expose soils and leave them susceptible to erosion. As previously discussed, transport of sediments during construction by stormwater runoff and winds would be prevented through BMPs such as implementation of Rule 403 dust control measures required by SCAQMD and a SWPPP, including an erosion control plan, in

compliance with the NPDES permit requirements for stormwater discharges. With adherence to existing regulations and implementation of preventative measures, construction impacts associated with erosion and siltation would be less than significant.

Following construction, the amount of impervious surfaces at the project site would be similar to existing conditions. Under existing conditions, stormwater runoff from Scattergood is captured in catch basins located throughout the station and discharged through the Units 1 and 2 OTC system. Because the OTC system would be removed from service following implementation of the proposed project, it would no longer be available for the purpose of stormwater discharge. Under the proposed project, stormwater runoff at Scattergood would be collected and recycled for industrial processes to the extent possible, thus minimizing stormwater runoff from the site that could lead to erosion or siltation. LADWP is considering various options for the discharge of stormwater that could not be reused, including the potential for it to be transmitted to Hyperion WRP via a new dedicated wastewater line. Therefore, there would be no substantial soil erosion or siltation would occur during project operations. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As previously discussed, a SWPPP would be developed and implemented for construction activities in compliance with the NPDES permit requirements for stormwater discharges. With adherence to existing regulations and implementation of preventative measures, impacts associated with flooding caused by surface runoff would be less than significant during construction.

As previously discussed, following construction, the amount of impervious surfaces at the project site would be similar to existing conditions. Furthermore, under the proposed project, stormwater runoff would be collected and recycled for industrial processes to the extent possible, minimizing the amount of stormwater runoff from the site that could result in flooding. LADWP is considering various options for the discharge of stormwater that could not be reused, including the potential for it to be transmitted to Hyperion WRP via a new dedicated wastewater line. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. As previously discussed, a SWPPP would be implemented to control runoff during construction. LADWP is considering various options during project operations for the discharge of stormwater that could not be reused on site, including the potential for it to be transmitted to Hyperion WRP, where it would undergo treatment. However, further coordination with Hyperion WRP must be conducted regarding this option. Therefore, the impact is potentially significant, and this issue will be further analyzed in the EIR.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The project site is classified as Zone X, an area of minimal flood hazard located outside the 500-year flood level.[28] Therefore, the potential for project facilities to impede or redirect flood flows is considered low. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed in Section 3.10(c)(iv) above, the project site is located outside the 500-year level. Tsunamis affect low-lying areas along the coastline. However, although located adjacent to the Pacific Ocean, the project site is not located within a designated Tsunami Hazard Area.[29] Seiches are oscillations generated in enclosed bodies of water usually as a result of earthquake related ground shaking. The project site is not located within the inundation zone of any enclosed water bodies or reservoirs. Therefore, the risk of release of pollutants due to project inundation is considered low. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As previously discussed, an erosion control plan and SWPPP would be developed and implemented pursuant to the NPDES permit requirements to control runoff, erosion, and sedimentation during project construction. Operation of the proposed project is not anticipated to create runoff in excess of or in varying quality to existing conditions. Implementation of the proposed project would not include the extraction of groundwater. Therefore, the project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur, and this issue will not be further analyzed in the EIR.

[28] Federal Emergency Management Agency. Flood Map Service Center. Available at: https://msc.fema.gov/portal/search. Accessed November 2022.

[29] California Department of Conservation. Los Angeles County Tsunami Hazard Areas. Available at: https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles. Accessed November 2022.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) Would the project physically divide an established community?

No Impact. Construction and operation of the proposed project would be located within the existing boundaries of Scattergood. Scattergood is owned by LADWP and occupied by facilities devoted to the production and transmission of electricity. No streets or sidewalks would be permanently closed as a result of the proposed project, and no separation of uses or disruption of access between land use types would occur. As such, the proposed project would not physically divide an established community. No impact would occur, and this issue will not be further analyzed in the EIR.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The proposed project would be located within the existing boundaries of Scattergood in the City of Los Angeles. Scattergood is zoned PF-1 (Public Facilities) under the City's zoning code and is designated as a Public Facilities land use under the City's General Plan. The existing uses are consistent with the zoning and general plan designations, and the project would not result in land use or zoning changes. Though Scattergood is adjacent to the Pacific Ocean, Scattergood itself 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). Thus, the proposed project would not conflict with existing land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur, and this issue will not be further analyzed in the EIR.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The proposed project is entirely located within a mineral resource zone (MRZ) area designated as MRZ-3, meaning an area containing known or inferred mineral aggregate resource(s) of undetermined mineral resource significance.[30] Scattergood is fully developed with electrical generation facilities. No mineral extraction occurs within or near the station. Thus, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur, and this issue will not be further analyzed in the EIR.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The project site is not delineated as a locally important mineral resource recovery site in the City of Los Angeles General Plan or other land use plan.[31] The proposed project would be located within a fully developed industrial site. Therefore, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site. No impact would occur, and this issue will not be further analyzed in the EIR.

[30] California Geological Survey. 2021. Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions. Available at: https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_254-MLC-SanFernandoValleySaugusNewhallPCR-2021-Plate01-MRZs-a11y.pdf. Accessed October 2022.

[31] City of Los Angeles, Department of City Planning. *City of Los Angeles General Plan – Conservation Element*. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed October 2022.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Other than the delivery of fill material and construction components to the site, the hauling of debris from the site, and the potential installation of a wastewater line to Hyperion WRP within Vista Del Mar, construction activities would be confined to the boundaries of Scattergood. Although noise related to construction activity would be temporary, it could potentially expose nearby sensitive receptors, such as residential uses, to noise levels above established standards. Although offset by the removal from service of Units 1 and 2, operation of the proposed project would result in noise created by the CCGS and related facilities. Therefore, the project may result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a general plan or noise ordinance. The impact is potentially significant, and this issue will be further analyzed in the EIR.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Certain activities during project construction may expose persons to excessive groundborne vibration or noise levels. The increase in groundborne vibration or noise has the potential to impact vibration-sensitive land uses within or surrounding the project site. The impact is potentially significant, and this issue will be further analyzed in the EIR.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As discussed in Response 3.9(e), the nearest airport to the project site is LAX, located approximately 0.75 miles north of Scattergood. However, the project site is not located within LAX's Airport Influence Area and is outside the 65 decibel Community Noise Equivalent Level noise contour for the airport. The project site would continue to be used for industrial uses, similar to existing conditions. Therefore, the proposed project would not expose people working or residing in the area to excessive noise levels. No impact would occur, and this issue will not be further analyzed in the EIR.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. Due to the relatively low number of personnel required for project construction in the context of the Los Angeles urban area and the temporary nature of construction jobs, no substantial population growth in the area would occur related to construction of the proposed project. The operation of the proposed project would not increase the number of personnel on site and thus would not induce population growth in the area. No impact due to construction or operations workforce would occur, and this issue will not be further analyzed in the EIR.

The proposed project would not include new housing or businesses that would directly induce population growth. The proposed project is an integral component of LADWP's SLTRP, providing critical local generation capacity that can be dependably and rapidly dispatched to respond to demand for energy in the LADWP service area to maintain the reliability and resilience of the City's electrical power grid. The proposed CCGS would be operated only to meet rare critical peaks in daily demand that exceed the available supply provided by renewable resources or during relatively short-term periods when renewable generation sources may become unavailable due to emergency circumstances. The project is required to meet existing and projected demand for electricity, which is anticipated to increase substantially with the electrification of various functions currently powered by the combustion of fossil fuels (e.g., cooking, space heating, water heating, and the transportation sector). Therefore, the proposed project would not indirectly induce population growth through the supply of electrical energy. No impact would occur, and this issue will not be further analyzed in the EIR.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. With the exception of a potential pipeline located within the road right-of-way, the proposed project would be located completely within the existing Scattergood property, which is entirely secured and excludes public access. The proposed project does not require removal of any housing. No impact would occur, and this issue will not be further analyzed in the EIR.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
ii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

No Impact. Fire protection services in the City are provided by the Los Angeles Fire Department. Los Angeles Fire Department Station 51, located at 10435 Sepulveda Boulevard, serves the project site.[32] An increased demand for fire protection is generally associated with new development. The proposed project would serve a similar function as the existing facilities it would replace and, therefore, would not represent new development. As discussed above in Section 3.14, the proposed project would not directly or indirectly induce population growth, and thus, would not result in a demand for additional fire protection services. Therefore, it is not anticipated that new or physically altered fire protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. No impact would occur, and this issue will not be further analyzed in the EIR.

[32] Los Angeles Fire Department. Find Your Station. Available at: https://www.lafd.org/fire-stations/station-results. Accessed October 2022.

ii. Police protection?

No Impact. The City of Los Angeles Police Department is the local law enforcement agency responsible for providing police protection services in the City. The Pacific Community Police Station, located at 12312 Culver Boulevard, serves the project site.[33] Scattergood is also guarded and patrolled by LADWP security personnel. Because the new CCGS would be constructed within the existing boundaries of Scattergood, no new police protection services would be required. Additionally, as discussed above in Section 3.14, the proposed project would not directly or indirectly induce population growth, and thus, would not result in a demand for additional police protection services. Therefore, it is not anticipated that new or physically altered police protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. No impact would occur, and this issue will not be further analyzed in the EIR.

iii. Schools?

No Impact. The demand for new or expanded school facilities is generally associated with an increase in housing, which would increase the population with school-aged children. As discussed above in Section 3.14, the proposed project would not directly or indirectly induce population growth. Therefore, the proposed project would not require the construction of additional schools or expansion of existing schools. No impact would occur, and this issue will not be further analyzed in the EIR.

iv. Parks?

No Impact. As discussed above in Section 3.14, the proposed project would not directly or indirectly induce population growth. Thus, the demand for parks would not increase with implementation of the proposed project. No impact would occur, and this issue will not be further analyzed in the EIR.

v. Other public facilities?

No Impact. The demand for other public facilities, such as libraries, is also generally associated with population growth. As discussed above in Section 3.14, the proposed project would not directly or indirectly induce population growth. Therefore, the proposed project would not the need for new or expanded public facilities, the provision of which could result in substantial adverse physical impacts. No impact would occur, and this issue will not be further analyzed in the EIR.

[33] Los Angeles Police Department. Your LAPD by Division, Pacific Community Police Station. Available at: https://www.lapdonline.org/lapd-contact/west-bureau/pacific-community-police-station/?zip=12700%20Vista%20Del%20Mar%20%20. Accessed October 2022.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Neither the construction nor operation of the proposed project would increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impact would occur, and this issue will not be further analyzed in the EIR.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project does not include recreational facilities or require construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No impact would occur, and this issue will not be further analyzed in the EIR.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Discussion

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?

No Impact. The majority of construction activities for the proposed project would occur within the boundaries of Scattergood. However, the potential installation of a new wastewater pipeline from Scattergood to Hyperion WRP would occur within Vista Del Mar. This would require traffic lane closures on Vista Del Mar during construction. A traffic control plan, as required by LADOT, would be implemented and would include such measures as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic. These disruptions would be temporary, and the roadway would be restored to pre-construction conditions after the pipeline installation was completed. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. No impact would occur, and this issue will not be further analyzed in the EIR.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

No Impact. California Senate Bill 743 (2013) required the Governor's Office of Planning and Research (OPR) to provide metrics other than road intersection level of service (i.e., traffic congestion) to determine the transportation impacts of proposed development and transportation projects. Based on Senate Bill 743 and as reflected in CEQA Guidelines Section 15064.3(b), OPR established that vehicle miles traveled (VMT) is the most appropriate measure for determining the significance of a project's transportation impacts. Under the OPR guidance, VMT refers to the amount and distance of automobile travel attributable to a project. Automobile in this context refers to on-road passenger vehicles, specifically cars and light trucks, and excludes heavy-duty trucks.

Individual local jurisdictions were tasked with preparing specific implementing guidelines for procedures to assess transportation impacts related to project VMT within their boundaries, including establishing thresholds of significance. Scattergood is located in the City of Los Angeles; therefore, the LADOT Transportation Assessment Guidelines (LADOT Guidelines) apply to the assessment of the proposed project's conflicts or inconsistencies with CEQA

Guidelines Section 15064.3(b).[34]

The LADOT Guidelines address thresholds of significance for land use development (residential, office, commercial, and other land uses) and transportation projects. The VMT assessment is intended to focus on the long-term, permanent transportation impacts related to the generation of automobile trips and the opportunities for alternative modes of transportation (public transit, walking, bicycling) associated with the development projects. Under the LADOT Guidelines, automobile trips associated with the temporary construction phase of a project are not considered to contribute to a VMT impact for the project.

In general, public services, including public utility functions such as Scattergood, are assumed under the LADOT Guidelines to not generate substantial VMT and, therefore, are presumed to have a less than significant impact on VMT. Furthermore, according to the guidelines, if any land use project would generate a net increase of less than 250 daily vehicle trips, a no impact determination can be made relative to conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b). As discussed in Section 1.5.3 (Project Operations), no additional personnel beyond those currently employed at Scattergood would be required to support operations of the proposed project, and, therefore, there would be no net increase in VMT. No impact would occur, and this issue will not be further analyzed in the EIR.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. As discussed above, the majority of construction activities for the proposed project would occur within the boundaries of Scattergood. However, the potential installation of a new wastewater pipeline from Scattergood to Hyperion WRP would occur within Vista Del Mar. This would require traffic lane closures on Vista Del Mar during construction. A traffic control plan would be implemented to minimize disruptions to traffic. These disruptions would be temporary, and the roadway would be restored to pre-construction conditions after the pipeline installation was completed. The project would not introduce new geometric design features or incompatible uses to the road network. No impact would occur, and this issue will not be further analyzed in the EIR.

d) Would the project result in inadequate emergency access?

No Impact. The potential installation of a new wastewater pipeline from Scattergood to Hyperion WRP within Vista Del Mar is currently planned under the proposed project, and traffic lane closures would be required during construction. A traffic control plan would be implemented to minimize disruptions to traffic and would ensure adequate emergency access during construction. The lane closures would be temporary, and the roadway would be restored to pre-construction conditions after the pipeline installation was completed. Therefore, the proposed project would not result in any impacts to emergency access. No impact would occur, and this issue will not be further analyzed in the EIR.

[34] Los Angeles Department of Transportation. Transportation Assessment Guidelines. August 2022. Available at: https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf. Accessed December 2022.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

Discussion

The following analysis is based in part on information provided in the Cultural Resources Technical Memorandum prepared for the proposed project, which is included as Appendix B to this IS. The identification of tribal cultural resources pursuant to Assembly Bill 52, which requires that a lead agency must consult with California Native American tribes who request formal consultation regarding potential impacts to tribal cultural resources. This consultation is being conducted by LADWP.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. As previously discussed, the entire Scattergood property has been highly disturbed, and ethnographic research does not indicate any villages or named places within or near the project site. Thus, the sensitivity of the project area for tribal cultural resources is considered low. Additionally, as discussed in Section 3.5, Cultural Resources, no historical resources listed or eligible for listing in the CRHR, or in a local register of historical resources, were identified within the project site. Therefore, the proposed project would not result in a substantial adverse change in the

significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical resources. No impact would occur, and this issue will not be further analyzed in the EIR.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Pursuant to Assembly Bill 52, LADWP has notified California Native American tribes known to be ancestrally affiliated with the project area and is conducting consultation with tribes that have requested such regarding specific knowledge of potential tribal cultural resources on or near the project site. The impact is potentially significant, and this issue will be further analyzed in the EIR.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. Although the proposed project entails the construction and operation of an electrical generation unit, it would be a net producer, not consumer, of electric power. The project would substantially increase the efficiency of electrical power production in relation to fuel consumption compared to the existing steam-boiler Units 1 and 2, and it would not require an expansion of natural gas facilities. The project would not require the expansion of existing telecommunications facilities.

Under current operations at Scattergood, water supplied by the LADWP system is utilized for several functions in the power generation process, including makeup water for the steam-boiler Units 1 and 2. The proposed project CCGS would also require water for uses such as the air inlet evaporative cooling, makeup for the HRSG/ACC steam cycle, and the WSAC. The use of potable water for the proposed project would be offset by a similar reduction in use associated with removal from service of existing Generation Units 1 and 2. It is also anticipated that the use of recycled water would be expanded under the proposed project through the reuse of industrial process water and from external sources, thereby reducing the use of potable water at Scattergood. In addition, because the proposed project CCGS and all generation units at

Scattergood are anticipated to only be operated infrequently compared to existing operations, the consumption of water on an annual basis would be reduced proportionally. Therefore, no expanded water treatment facilities would be required.

Under the proposed project, industrial wastewater and stormwater runoff would be collected and recycled for industrial processes at Scattergood to the extent possible. LADWP is considering various options for the discharge of wastewater and stormwater that could not be reused, including the potential for it to be transmitted to Hyperion WRP via a new dedicated wastewater line that would be installed in Vista Del Mar under the proposed project. To transmit the wastewater and stormwater runoff to Hyperion WRP, t a dedicated wastewater line within Vista Del Mar from Scattergood to Hyperion WRP would be installed under the proposed project.

However, while it is anticipated that the quality and quantity of these wastewater and stormwater discharges could be accommodated at Hyperion WRP without expansion of existing facilities, further coordination with Hyperion WRP regarding the proposed plans must be conducted. Therefore, the impact is potentially significant, and this issue will be further analyzed in the EIR.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As discussed in Section 3.19(a) above, the use of potable water for the proposed project would be offset by a similar reduction in use associated with removal from service of existing Generation Units 1 and 2. It is also anticipated that the use of recycled water for industrial processes would be expanded under the proposed project, thereby reducing the use of potable water at Scattergood. In addition, because the proposed project CCGS, as well as all generation units at Scattergood, is anticipated to be operated only infrequently compared to existing operations, the consumption of water would be reduced proportionally on an annual basis. Therefore, there would be sufficient water supplies available to serve the project. The impact would be less than significant, and this issue will not be further analyzed in the EIR.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. As discussed above, the proposed project would change the process for handling industrial wastewater and stormwater runoff at Scattergood during project operations. Under existing conditions, industrial wastewater is temporarily stored in holding tanks and discharged at highly diluted concentrations to the ocean via the OTC system for Units 1 and 2. Stormwater runoff is currently captured in catch basins and treated as necessary in separators or via settlement and is discharged through the OTC system. However, after project implementation, the OTC system would no longer be available for the purpose of wastewater and stormwater discharge. Instead, under the proposed project, wastewater and stormwater would be captured to the extent possible utilizing the existing wastewater storage tanks located in the southwest corner of Scattergood. This water would then be pumped to the existing process water storage tanks at the east end of Scattergood, from which it would be recycled for use within the generator systems. LADWP is considering various options to address wastewater and stormwater that could not be reused, including the potential for it to be treated at Hyperion WRP. As discussed above, this would entail constructing a dedicated wastewater line in Vista

Del Mar from Scattergood to Hyperion WRP as well as reconfiguring the existing wastewater and stormwater collection systems within Scattergood.

While it is anticipated that the quality and quantity of these wastewater and stormwater discharges could be accommodated at Hyperion WRP without expansion of capacity, further coordination with Hyperion WRP regarding the proposed plans must be conducted. Therefore, the impact is potentially significant, and this issue will be further analyzed in the EIR.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The construction of the proposed project would generate solid waste in the form of excavated material and general construction debris. However, the volume of waste generated during project construction would be small both in terms of daily throughout and current remaining capacity of area landfills. Additionally, the proposed project would incorporate source reduction techniques and recycling measures in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance, which would reduce the amount of construction-generated solid waste that would require disposal in the landfill. Thus, the amount of solid waste generated during construction of the proposed project would be minimized. Construction of the proposed project would not generate excess solid waste or impair solid waste reduction goals.

Project operations would not significantly change the solid waste disposal requirements at Scattergood from current conditions such that excess solid waste would be generated. Similar to existing operations for Units 1 and 2, which would be removed from service concurrent with the commissioning of the proposed project, small amounts of hazardous waste would be generated during operations. Over time, the catalyst material used in the SCR process would lose its effectiveness and would need to be replaced. The spent catalyst would be recycled, or it would be transported to a permitted hazardous waste treatment, storage, or disposal facility. The relatively small amount of hazardous waste generated by the proposed project operations would be similar to existing conditions and would not generate significant quantities of material such that the capacity of area landfills would be exceeded or that the attainment of waste reduction goals would be impaired. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Construction debris and excavated soils would be disposed of in accordance with federal, state, and local statutes and regulations, including the City's Construction and Demolition Ordinance with the County-wide Integrated Waste Management Plan. The relatively small volume of solid waste generated during project operations, which would be similar in type and amount to current conditions, would also be recycled or disposed of in accordance with local, state, and federal statutes and regulations. No impact would occur, and this issue will not be further analyzed in the EIR.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Scattergood is located within the City of Los Angeles and abuts the City of El Segundo. Therefore, it is not located in or near a state responsibility area. Scattergood is not located in or near land classified as a VHFHSZ by the City.[35] Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. Scattergood is not located in or near a state responsibility area or land classified as a VHFHSZ by the City. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

[35] Los Angeles Fire Department. Fire Zone Map. Available at: https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map. Accessed December 2022.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. Scattergood is not located in or near a state responsibility area or land classified as a VHFHSZ by the City. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. Scattergood is not located in or near a state responsibility area or land classified as a VHFHSZ by the City. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As described in Section 3.4, Biological Resources, other than the ESB, as discussed further below, no special-status plant or wildlife species are anticipated to occur within or close to the project site. ESB are known to exist adjacent to the southern parcel of Scattergood. However, no suitable ESB habitat would be impacted by the proposed project because no coast buckwheat is present within the Scattergood property. Birds nesting in ornamental trees within or near Scattergood would have the potential to be disturbed by construction activities. However, nesting birds would be protected via compliance with the Migratory Bird Treaty Act, as required under BMP-1. In addition, there are no natural vegetation communities, riparian habitat, wetlands, or wildlife corridors within the Scattergood property. Therefore, the proposed project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Impacts would be less than significant.

As described in Section 3.5, Cultural Resources, the project site does not support any important examples of major periods in California history. Additionally, there are no known important examples of California prehistory on the project site, and there is very low to no potential that unknown archaeological resources will be encountered during ground-disturbing activities due to previous disturbance at the property and the existence of aeolian sand dunes at the site prior

to development. Nonetheless, as discussed in Section 3.18, Tribal Cultural Resources, pursuant to Assembly Bill 52, LADWP has notified California Native American tribes known to be ancestrally affiliated with the project area and is conducting consultation with tribes that have requested such regarding specific knowledge of potential tribal cultural resources on or near the project site. Therefore, in relation to tribal cultural resources, the impact is potentially significant, and this issue will be further analyzed in the EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The analysis conducted in the EIR may determine that certain impacts related to proposed project construction and/or operation would be less than significant, either with or without the incorporation of mitigation measures. However, the potential exists for such impacts, although individually limited, to make a cumulatively considerable contribution to potentially significant impacts caused by the combined effects of the proposed project and the impacts of other projects that are closely related geographically (i.e., within the same vicinity or greater region, depending on the nature and scope of the project and environmental factor under consideration) and in time (i.e., recently completed projects, projects currently under construction, and/or projects anticipated to be implemented in the near-term future). Therefore, the impact is potentially significant, and this issue will be further analyzed in the EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed throughout Chapter 3, the proposed project could have environmental effects which will cause adverse effects on human beings related to aesthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, hydrology, noise, and utilities. Therefore, the impact is potentially significant, and this issue will be further analyzed in the EIR.

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Appendices

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Appendix A

Biological Resources Assessment

Michael Baker
INTERNATIONAL

We Make a Difference

May 2, 2023 JN 191844

Jazmin Martin
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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 species[1] 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 (CNDDB; 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.

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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 CNDDB (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 CNDDB (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 CNDDB, 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 CNDDB 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 CNDDB 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 CNDDB, 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 CNDDB 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 CNDDB 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 CNDDB, 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 CNDDB 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,

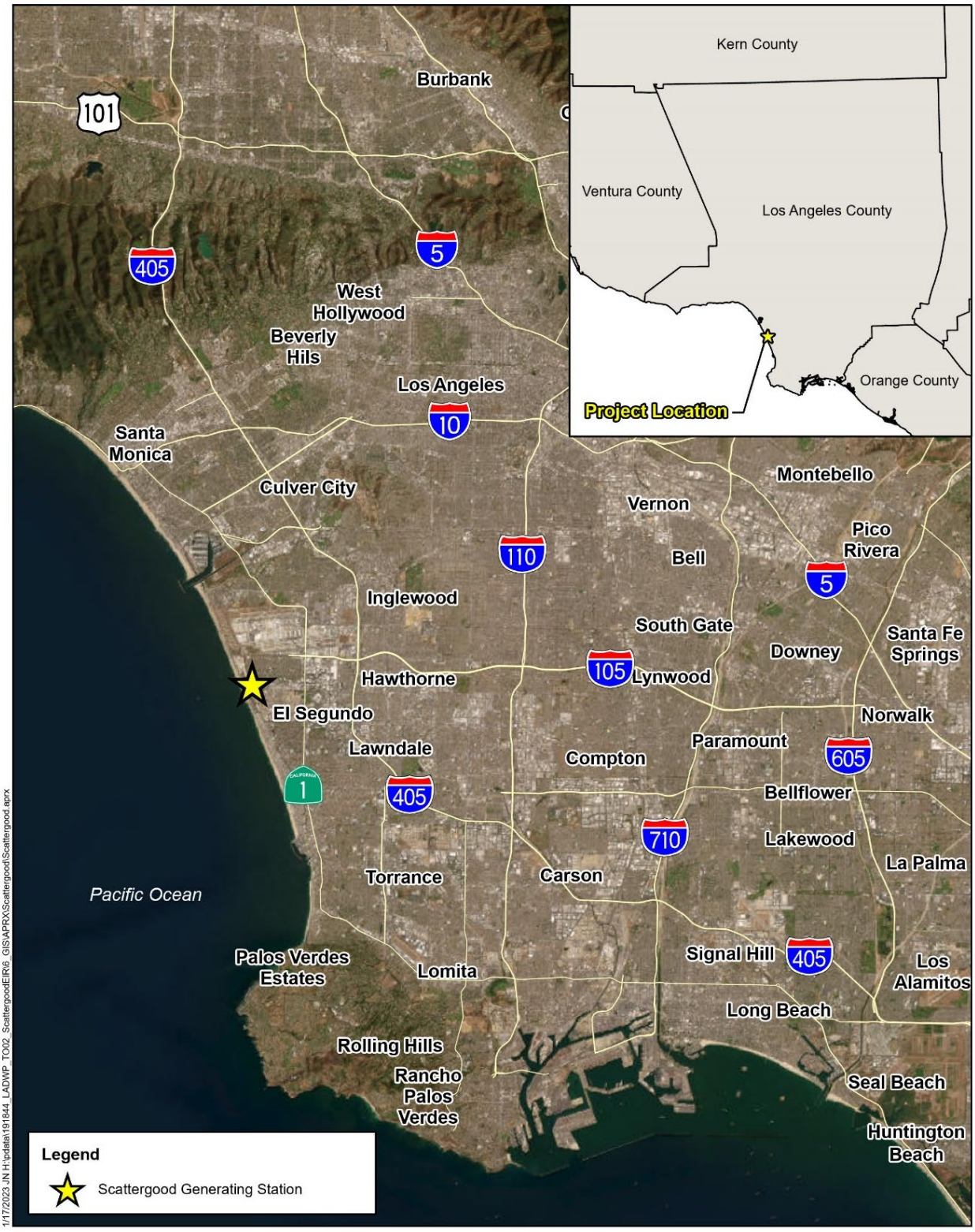
John Parent
Biologist

Attachments:

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

Attachment A

Project Figures



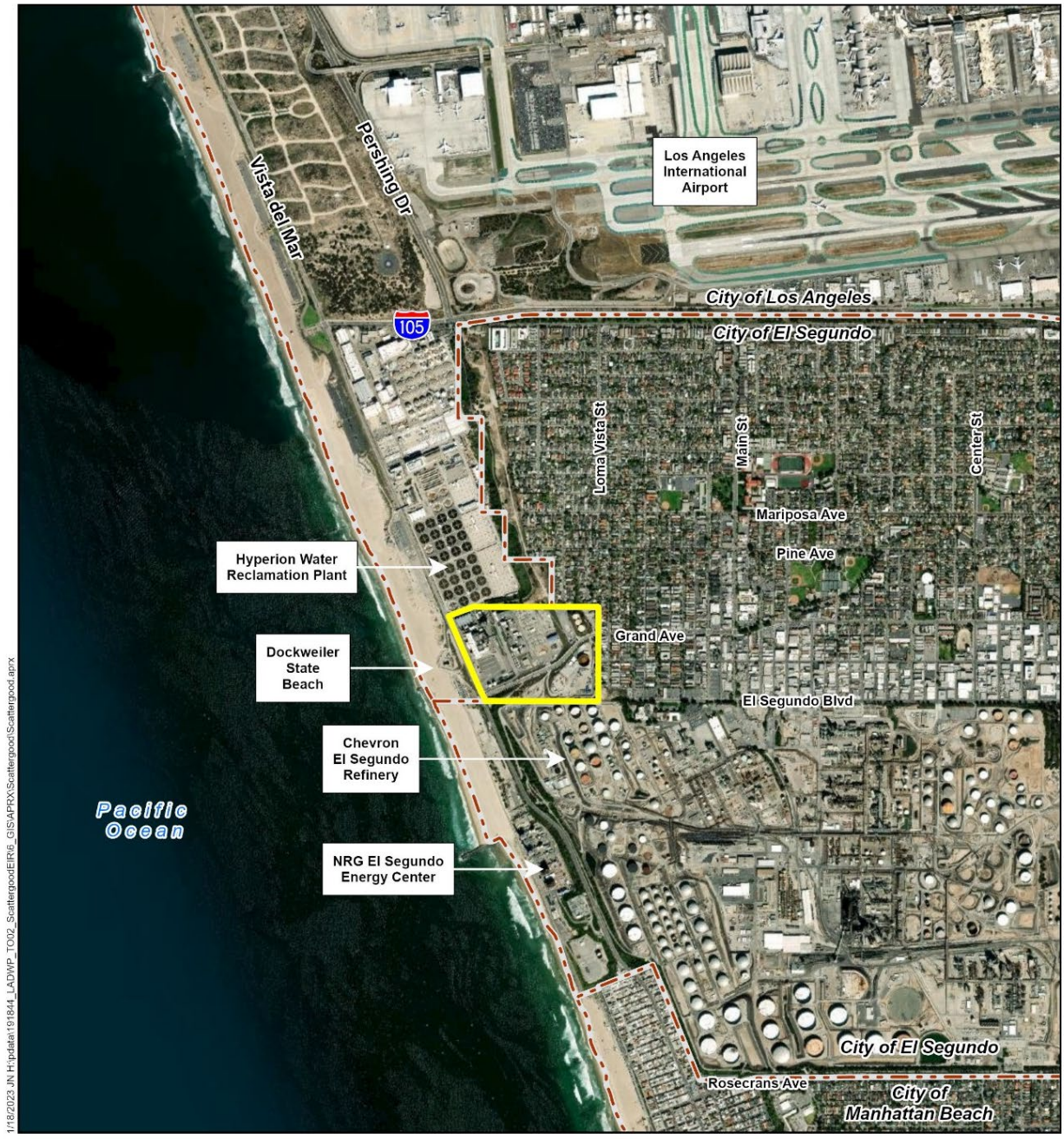
0 2 4 Miles

Source: ArcGIS Online, 2018

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

Regional Location Map

Figure 1



Legend

Scattergood Generating Station

City Boundary

0 1,000 2,000 Feet

Source: ArcGIS Online

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

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

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

Scientific Name Common Name	**Special-Status Rank***	**Habitat Preferences and Distribution**	**Observed On-site**	**Potential to Occur**
SPECIAL-STATUS WILDLIFE SPECIES				
Agelaius tricolor 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 (Typha spp.), willows (Salix spp.), and bulrushes (Schoenoplectus 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.
Anniella stebbinsii 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.
Athene cunicularia 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.
Bombus crotchii 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 Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	No	**Not Expected.** There is no suitable habitat within the survey area to support this species.
Charadrius nivosus nivosus 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 forging 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

Scientific Name Common Name	**Special-Status Rank***	**Habitat Preferences and Distribution**	**Observed On-site**	**Potential to Occur**
Coccyzus americanus occidentalis 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.
Coturnicops noveboracensis 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.
***Danaus plexippus* 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.
Empidonax traillii extimus 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.
Emys marmorata 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.
Eumops perotis californicus 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

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
Euphilotes battoides allyni El Segundo blue butterfly	FE G5T1 S1	Suitable habitat is limited to coastal scrub containing the host plant, seacliff buckwheat (*Eriogonum parviflorum*) 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.
Glaucopsyche lygdamus palosverdesensis 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 (Astragalus trichopodus lonchus) and deerweed (Acmispon glaber). 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.
Laterallus jamaicensis coturniculus California black rail	ST FP G3T1 S1	Suitable habitat generally includes salt marshes, freshwater marshes, and wet meadows. Typical associated vegetation includes pickle weed (Salicornia virginica), in salt marshes and bulrush (Scirpus spp.) in less saline habitats.	No	**Not Expected.** There is no suitable habitat within the survey area to support this species.
Microtus californicus stephensi 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.
Nyctinomops femorosaccus 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 (Yucca brevifolia) 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.
Passerculus sandwichensis beldingi 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.
Pelecanus occidentalis californicus California brown pelican	FP G4T3T4 S3	Found on rocky or vegetated offshore islnds, 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

Scientific Name Common Name	**Special-Status Rank***	**Habitat Preferences and Distribution**	**Observed On-site**	**Potential to Occur**
Perognathus longimembris pacificus Pacific pocket mouse	FE SSC G5T1 S2	One of sixteen currently recognized subspecies of little pocket mouse (Perognathus longimembris), 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.
Phrynosoma blainvillii 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.
Polioptila californica californica 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.
Siphateles bicolor mohavensis 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.
Sorex ornatus salicornicus 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 (*Salicornia* spp.) marshes, has also been known to occur with dense willow (*Salix* spp.) and bulrush (*Scirpus* 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

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
Spea hammondii 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 (Lithobates catesbeianus), 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.
Sterna antillarum browni 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.
Streptocephalus woottoni 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.
Taxidea taxus 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.
Vireo bellii pusillus 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				
Abronia maritima 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.
Aphanisma blitoides 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.
Astragalus pycnostachyus var, lanosissimus 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.
Astragalus tener* var. *titi 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.
Atriplex coulteri 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.
Atriplex pacifica 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.
Atriplex parishii Parish's brittlescale	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.
Atriplex serenana var. davidsonii 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.
Calochortus catalinae 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.
Calystegia peirsonii 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

Scientific Name Common Name	**Special-Status Rank***	**Habitat Preferences and Distribution**	**Observed On-site**	**Potential to Occur**
Camissoniopsis lewisii Lewis's evening-primrose	3 G4 S4	Annual herb. Occurs in coastal bluff scrub, cismontane woodland, coastal dunes, costal 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.
Centromadia parryi ssp. australis 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.
Centromadia pungens* ssp. *laevis 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.
Chaenactis glabriuscula* var. *orcuttiana 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.
Chenopodium littoreum 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.
Chloropyron maritimum ssp. maritimum 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.
Chorizanthe parryi* var. *fernandina 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.
Cistanthe maritima 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.
Convolvulus simulans 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.
Deinandra paniculata paniculate tarplant	4.2 G4 S4	Annual herb. Occurs usually in vernally 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

Scientific Name Common Name	**Special-Status Rank***	**Habitat Preferences and Distribution**	**Observed On-site**	**Potential to Occur**
Dichondra occidentalis 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.
Dithyrea maritima 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.
Dudleya virens* ssp. *insularis 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.
Eryngium aristulatum* var. *parishii 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.
Erysimum insulare 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.
Erysimum suffrutescens 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.
Hordeum intercedens 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.
Horkelia cuneata* var. *puberula mesa horkelia	1B.1 G4T1 S1	Perennial herb. Habitat includes gravelly and sandy souls 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.
Isocoma menziesii* var. *decumbens 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

Scientific Name Common Name	**Special-Status Rank***	**Habitat Preferences and Distribution**	**Observed On-site**	**Potential to Occur**
Juglans californica 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.
Lasthenia glabrata* ssp. *coulteri 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.
Lycium brevipes* var. *hassei 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.
Lycium californicum 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.
Nama stenocarpa 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.
Navarretia fossalis 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.
Navarretia prostrata 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.
Orcuttia californica 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.
Pentachaeta lyonii 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.
Phacelia ramosissima* var. *austrolitoralis 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

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
Phacelia stellaris 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.
Potentilla multijuga 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.
Sidalcea neomexicana 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.
Suaeda esteroa 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.
Suaeda taxifolia 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.
Symphyotrichum defoliatum 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 vernally 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

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
CNDDB/Holland (1986) Southern Coastal Bluff Scrub **MCV (1995)** California buckwheat series **NVCS (2009)** Eriogonum fasciculatum shrubland Alliance	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 (Artemisia californica), Purple sage (Salvia leucophylla), Giant coreopsis (Coreopsis gigantea), Island tarplant (Deinandra clementina), St. Catherine's lace (Eriogonum giganteum), Greene's live forever (Dudleya greenei), Bush sunflower (Encelia californica), Coastal buckwheat (Eriogonum cinereum), Island buckwheat (Eriogonum arborescens), Island buckwheat (Eriogonum grande), California buckwheat (Eriogonum fasciculatum), Saw toothed goldenbush (Hazardia squarrosa), Menzies's goldenbush (Isocoma menziesii), California boxthorn (Lycium californicum), Prickly pear (Opuntia littoralis), Chaparral prickly pear (Opuntia oricola), Coastal cholla (Cylindropuntia prolifera), and Black sage (Salvia mellifera). 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.
CNDDB/Holland (1986) Southern Coastal Salt Marsh **MCV (1995)** Cordgrass Series **NVCS (2009)** *Spartina foliosa* Herbaceous Alliance	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 (*Spartina foliosa*), pineapple weed (*Amblyopappus pussilus*), Watson's saltbush (*Atriplex watsonii*), beachwort (*Batis maritima*), alkaliweed (*Cressa truxiliensis*), salt marsh dodder (*Cuscuta sallna*), seashore saltgrass (*Distichlis spicata* var. *spicata*), alkali heath (*Frankenia grandifolia*), salt heliotrope (*Heliotropium curassavicum*), marsh jaumea (*Jaumea carnosa*), wire grass (*Juncus acutus sphaerocarpus*), and California seablite (*Suaeda californica*). 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

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution	Observed On-site	Potential to Occur
CNDDB/Holland (1986) Southern Dune Scrub **MCV (1995)** Dune lupine-goldenbush series **NVCS (2009)** 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 (noncyclical) 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 Infraspecific 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

Michael Baker
INTERNATIONAL

We Make a Difference

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.*), ripgut brome (Bromus rigidus), slender oats (*Avena barbata*), reds-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,

Biologist, 018909-06

Attachment F

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Appendix B

Cultural and Paleontological Resources Identification Report

Michael Baker
INTERNATIONAL

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 chapparal, 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

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)

- *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).

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 (*Tivela stultorum*) 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 (*Proboscidea*)	Unknown formation (Pleistocene sands)	Pleistocene	Within 1 Mile
LACM VP 7332	Mammoth (*Mammuthus*)	Unknown formation (Pleistocene; silty sand)	Pleistocene	Within 3.25 Miles
LACM VP 4942	Mammoth (*Mammuthus*); bison (*Bison*); hare (*Lepus*)	Unknown formation (Pleistocene, massive sandy mudstone w scattered pieces of gravel)	Pleistocene	Within 3.5 Miles
LACM VP 3789	Mammoth (*Mammuthus*)	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)

- 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

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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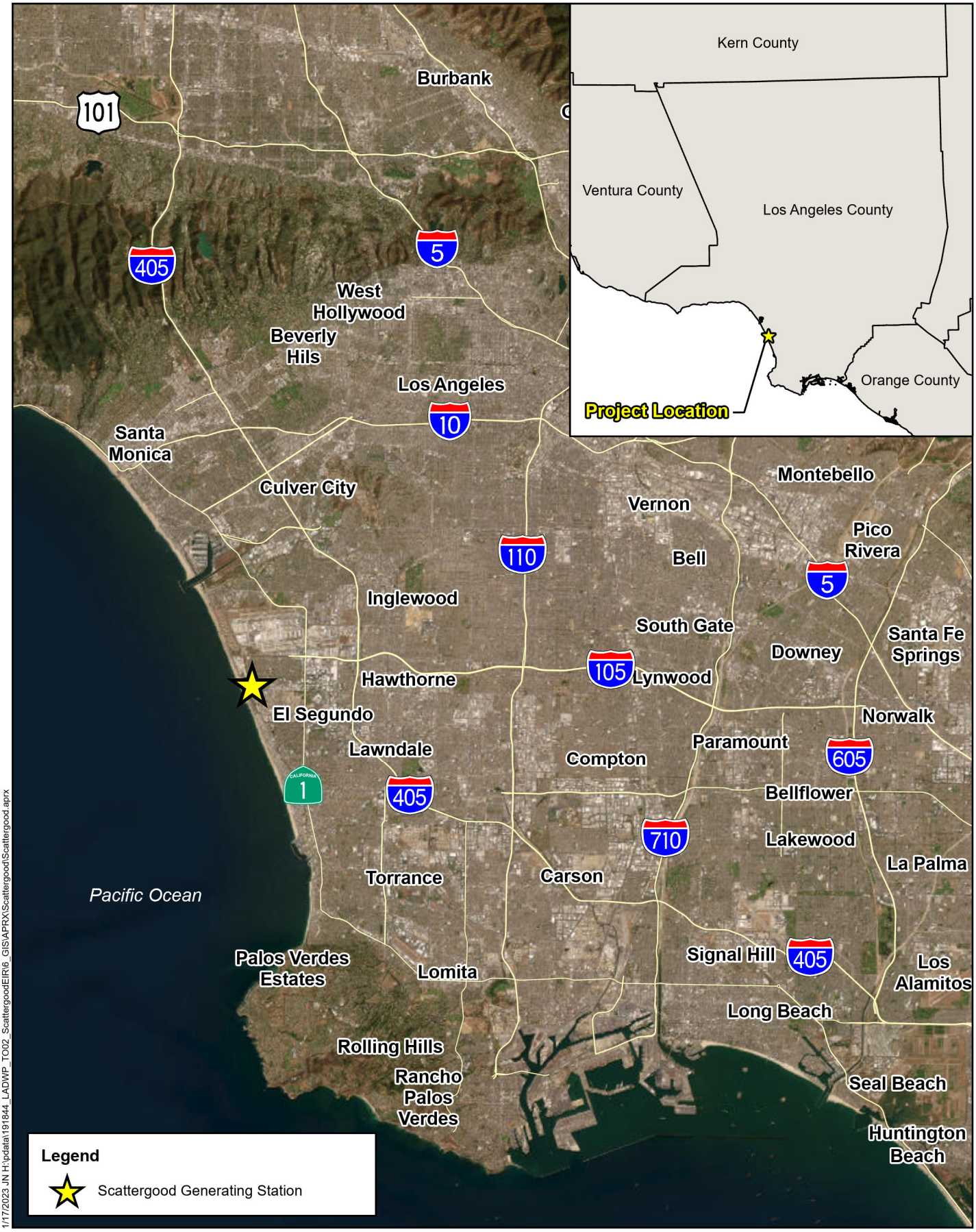
Attachment 1

Figures



1/17/2023 JN H:\pdata\191844_LADWP_TO02_ScattergoodEIR\6_GIS\APRX\Scattergood\Scattergood.aprx

LA DWP

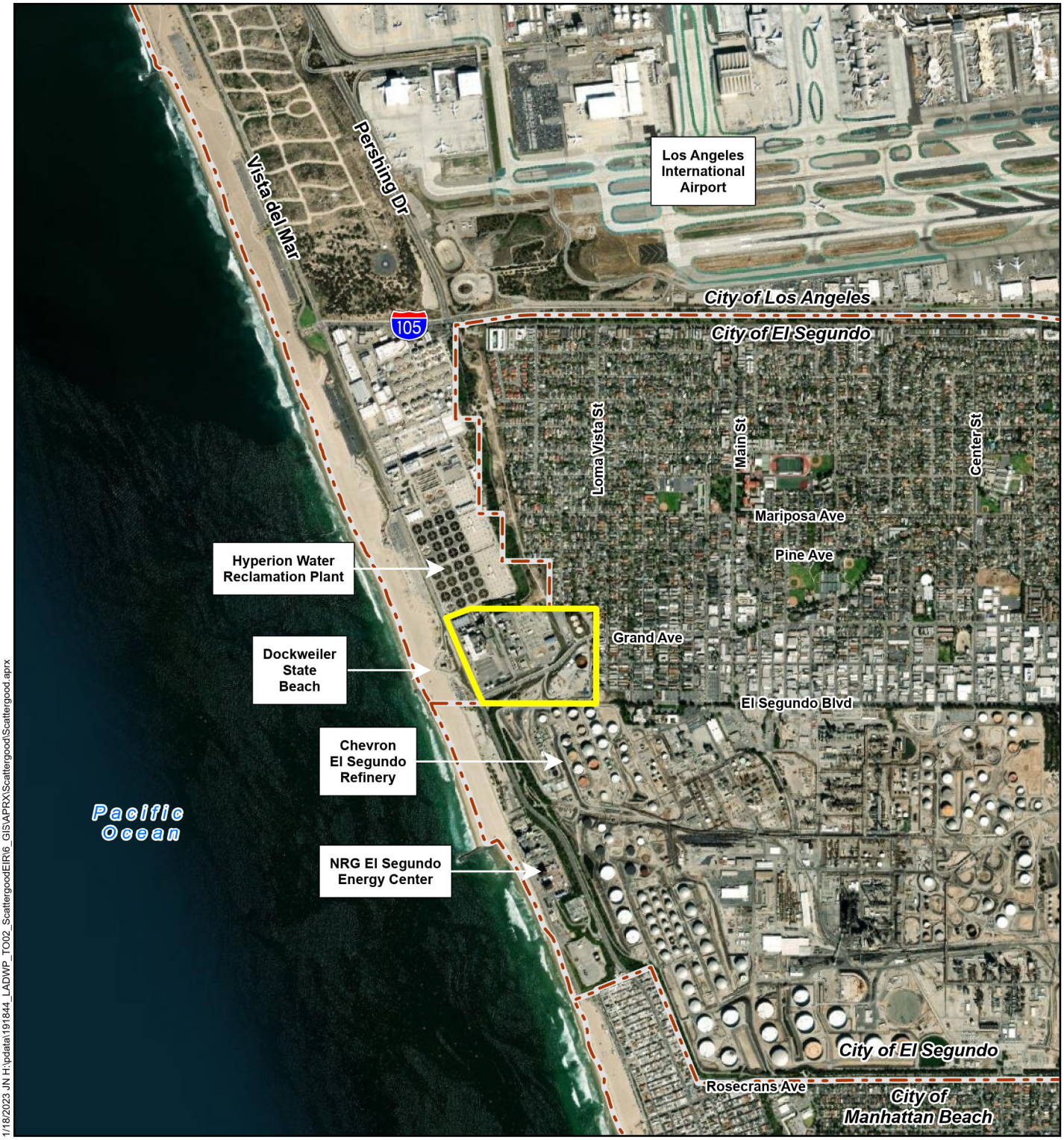
0 2 4 Miles

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

0 1,000 2,000 Feet

Source: ArcGIS Online

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

Project Site

Figure 2

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

 *Resource Name or #: Scattergood Generating Station

P1. Other Identifier:
***P2. Location:** X 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 Internationl 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 X 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:**
X 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 **X** Location Map ☐Sketch Map Continuation Sheet **X** Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (List):

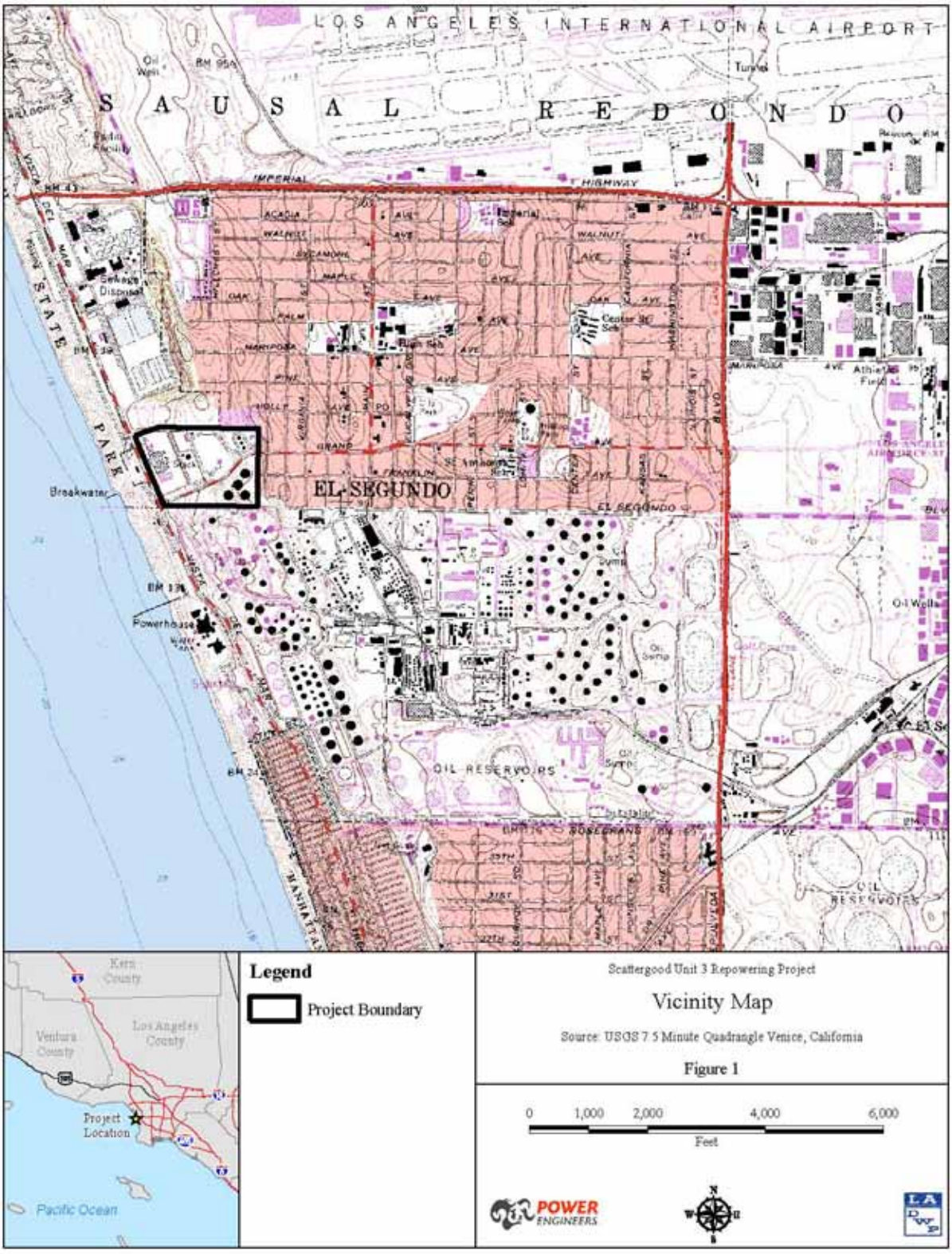
State of California — The Resources Agency Primary #

DEPARTMENT OF PARKS AND RECREATION HRI#

LOCATION MAP Trinomial

Page **2** of **7** *Resource Name or #: **Scattergood Generation Station**

*Map Name: **Venice, California** *Scale: 1:24,000 *Date of Map: April 29, 2011



DPR 523J (1/95) *Required information

BUILDING, STRUCTURE, AND OBJECT RECORD

***NRHP Status Code**

***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 whowas 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?** X 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

***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?** X 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)

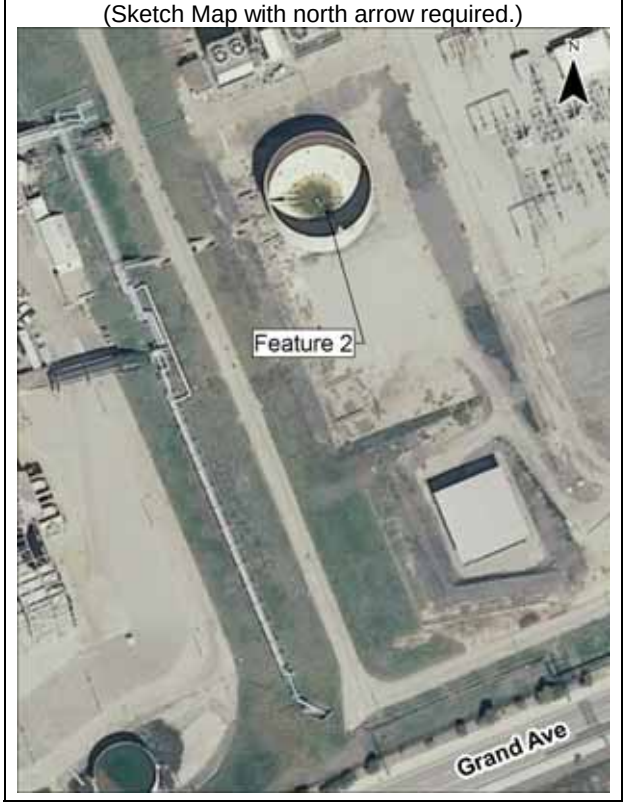
***B12. References:**

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

***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?** X 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.)

DEPARTMENT OF PARKS AND RECREATION **HRI#**

BUILDING, STRUCTURE, AND OBJECT RECORD

 ***NRHP Status Code**

***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? X 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)

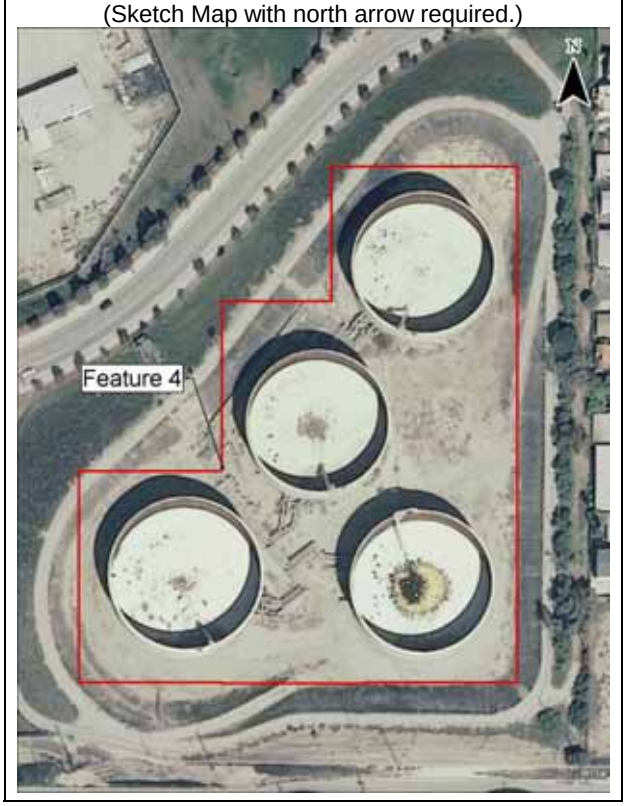
***B12. References:**

B13. Remarks:

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

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

(Sketch Map with north arrow required.)



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 (*Tivela stultorum*) 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 (*Mammuthus*)	40 feet bgs
LACM VP 4942	SE corner of Airport Blvd. & Manchester Ave	Unknown formation (Pleistocene, massive sandy	Mammoth (Mammuthus); bison (Bison); hare (Lepus)	16 feet bgs

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