



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
Carlsbad Field Office  
2730 Loker Avenue West  
Carlsbad, California 92008

March 5, 1997

Mr. Charles Posner  
California Coastal Commission  
245 West Broadway  
Long Beach, California 90802

Subject: Habitat Destruction at Ballona Lagoon, Los Angeles County,  
California

Dear Mr. Posner:

This letter concerns the grading of natural habitat that occurred on or about February 17, 1997, on the east side of Ballona Lagoon in Los Angeles County, California. At issue are the adverse impacts to the potential habitat of the endangered El Segundo blue butterfly (*Euphilotes bernardino allyni*), and the sand dune/intertidal habitats. The butterfly is fully protected under the Endangered Species Act of 1973, as amended (Act). The comments and recommendations in this letter are based on telephone conversations between Ken Johnson of Concept Marine, the contractor, and Chris Nagano of my staff on February 19 and 25, and March 4, 1997; a field meeting between Ron Katayama of Terra-Cal, another contractor, Ken Johnson, and Chris Nagano on February 26, 1997; a field meeting on February 26, 1997, between Ken Johnson, Chris Nagano, and Dr. Rudi Mattoni, Travis Longcore, and Catherine Rich of the Urban Wildlands group from the University of California at Los Angeles (UCLA); and other information available to the U.S. Fish and Wildlife Service (Service).

On February 26, 1997, Chris Nagano observed that extensive grading had occurred along the east side of Ballona Lagoon from the mouth of the channel at Via Marina Drive to approximately Via Dolce. The damage was caused because bulldozers, rather than hand removal, had been used to clear vegetation. It appears the plan that Dr. Mattoni had prepared for the project was not followed by Mr. Johnson or Mr. Katayama. We also are concerned that other portions of the project may not be in compliance with other permit conditions and may adversely impact wildlife resources. Mr. Nagano observed two damaged areas that contain coast buckwheat (*Eriogonum parvifolium*), the foodplant to the El Segundo blue butterfly. Mr. Nagano also found that nearly all native dune and wetland vegetation had been removed or damaged in this area. A dead gopher snake (*Pituophis melanoleucus*) that had been killed by the grading was found at the site. At the field meeting on February 25, 1997, Mr. Johnson and Mr. Katayama stated to Chris Nagano that the grading was the result of their work. They further stated to Chris Nagano that they intended to fully mitigate for their grading.

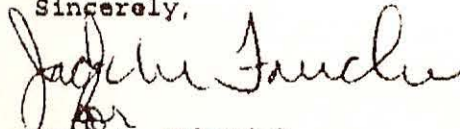
Mr. Charles Posner

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On February 25 and 26, and March 4, 1997, Mr. Johnson told Chris Nagano that Dr. Mattoni would be preparing the mitigation plan for the grading. On March 4, 1997, Mr. Johnson told Chris Nagano that he would be meeting with a nursery regarding the use of plants of an uncertain origin at the site. The Service concurs that an adequate plan likely would mitigate for the adverse impacts resulting from the grading. However, only appropriate native plants from local sources should be utilized during the restoration. We recommend that the planting of vegetation, as proposed by Mr. Johnson on March 4, 1997, not be implemented until the mitigation plan has been reviewed and approved by the Service.

Please contact Chris Nagano of my staff at the letterhead address or at 619/431-9440 if you have any questions.

Sincerely,



Gail C. Kobetich  
Field Supervisor

cc: CDFG, Long Beach, CA (Attn: J. Hernandez)  
CDFG, San Diego, CA (Attn: B. Tippetts)  
CDFG, Sacramento, CA (Attn: D. Warenycia)  
Coastal Conservancy, Oakland, CA (Attn: R. Holderman)  
COE, Los Angeles, CA (Attn: F. Tabatabai)  
DRP, Los Angeles, CA (Attn: D. Koutnik)  
Concept Marine, Oakland, CA (Attn: K. Johnson)  
Terra-Cal, Baldwin Park, CA (Attn: R. Katayama)

From: Dan