



WEST LOS ANGELES AREA PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: August 13, 2026

Case No.: DIR-2024-1588-CDP-1A

Council District: 11 – Park

CEQA: ENV-2024-1589-CE

Plan Area: Westchester – Playa Del Rey

Project Site: 13374 West Jefferson Boulevard

Applicant: Tom McMahan, Southern California Gas Company
Representative: James Chuang, Southern California Gas Company

Appellant: Marcia Hanscom, Defend Ballona Wetlands

At its meeting of **July 1, 2026**, the West Los Angeles Area Planning Commission took the actions below in conjunction with the following Project:

The plugging and abandonment of the natural gas well Vidor 15 (API: 0403714071) at the Playa Del Rey Natural Gas Storage Facility, located within an upland area of the Ballona Wetlands Ecological Reserve. Required work would include use of a workover rig to remove piping and the wellhead, setting cement plugs, cutting the top portion of the well casing, sealing the well, and placing identifying information. Mechanical Integrity Testing (MIT) may also be required depending on guidance from CalGEM.

1. **Determined**, based on the whole of the administrative record, that the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15301, Class 1 (Existing Facilities), and that there is no substantial evidence demonstrating that an exception to a Categorical Exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Granted** the appeal in part; **Denied** the appeal in part; and **sustained** the Director of Planning's Determination dated October 24, 2025;
3. **Approved**, pursuant to Chapter 1A Section 13B.9.1 of the Los Angeles Municipal Code, a Coastal Development Permit for the Proposed Project, located in the Dual Permit Jurisdiction Area of the Coastal Zone;
4. **Adopted** the attached Modified Conditions of Approval; and
5. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Shelton

Second: Ryan

Ayes: Goldman, Sandifer

Absent: Waltz-Morocco

Vote: 4 – 0

Alma Sandoval

Alma Sandoval, Commission Executive Assistant I
West Los Angeles Area Planning Commission

APPEAL PERIOD - EFFECTIVE DATE

The decision of the West Los Angeles Area Planning Commission is final and effective upon the mailing of this determination letter and not further appealable.

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination on the CEQA clearance is an appealable clearance under Section 13B.11.1.F.2. (EIR, ND, MND, SCEA, Exemption/No Project) made by a decisionmaker other than the City Council; all available appeals on the entitlement approval(s) have been taken; and the Determination on the entitlement(s) is final and not further appealable.

California Coastal Commission/Appeals:

The proposed development is in the Dual Permit Jurisdiction Area of the Coastal Zone.

Pursuant to Section 13B.9.1.D.4 of Chapter 1A of the LAMC, the West Los Angeles Area Planning Commission's action on the Coastal Development Permit shall be deemed final only after 20 working days have expired from the date this decision letter is deemed received by the Executive Officer of the California Coastal Commission and provided that a timely, valid appeal is not taken by the California Coastal Commission within said time frame.

Furthermore, this coastal development permit shall be subject to revocation as provided in Section 13B.9.1.I.2 of Chapter 1A of the LAMC, as authorized by Section 30333 of the California Public Resources Code and Section 13105 of the California Administrative Code.

WHO CAN FILE AN APPEAL

An applicant or any other person aggrieved by the Decision Maker's decision may file an appeal.

HOW TO FILE AN APPEAL

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below:

Forms are available online at <http://planning.lacity.gov/development-services/forms>.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)



QR Code to
Online Appeal Filing

Online Application System (OAS): The OAS (<https://planning.lacity.gov/oas>) allows entitlement appeals to be submitted entirely online. Appeal fees may be paid for by credit card or e-check.

IN PERSON APPEAL FILINGS



QR Code to Forms
for In-Person Appeal
Filing

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check.

- a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications;
- b. Alternatively, appeal applications can be filed with staff at DSC public counters.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa St 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Blvd Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

SCHEDULING CASE CONDITION CLEARANCE AND BUILDING PERMIT SIGN-OFFS

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).



QR Code to BuildLA
Appointment Portal for
Condition Clearance

In order to clear conditions and/or obtain building permit sign-offs, you must make an [appointment](#) with the Department of City Planning's Development Services Center (DSC). You may schedule a Case Condition Clearance Appointment with the DSC at appointments.lacity.org after the effective date of the determination..

See instructions on how to prepare for your appointment at planning.lacity.gov/project-review/case-filings

Attachments: Modified Conditions of Approval, Amended Findings

cc: Juliet Oh, Senior City Planner
Kenton Trinh, City Planner
Caelen Rafferty, Planning Assistant

CONDITIONS OF APPROVAL

(As Modified by the West Los Angeles Area Planning Commission at its meeting on July 1, 2026)

1. Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. The area of work shall be limited to the "Work Area", as shown in "Exhibit A", delineated by the proposed temporary sound panel walls and gates, with staging allowed on nearby SoCalGas-owned facilities, also shown in "Exhibit A". No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.
2. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
3. **Dual Permit Jurisdiction Area.** The project is located within the Dual Permit Jurisdiction area of the California Coastal Zone. Pursuant to LAMC Section 13B.9.1.D.4, the decision of the permit granting authority, or any appeal body to approve issuance of a permit shall not be deemed to be final and no Coastal Development Permit may be issued until 20 working days have expired from the date said notice of permit issuance is deemed received by said Executive Director and without an appeal having been taken to the Coastal Commission. As further stipulated in California Code of Regulations Section 13313, the permit shall not become effective until the requirements of Public Resources Code (PRC) Section 30601 have been fulfilled. As required by PRC Section 30601, the applicant shall file an application for a second (or "dual") coastal development permit with the Coastal Commission. Prior to the issuance of any permits, the Applicant shall submit proof of a valid ("dual") permit issued by the Coastal Commission.
4. **Grading.** The project includes necessary grading and excavation, comprised of 100 cubic yards of cut and fill and the import of 75 cubic yards of soil, subject to review and final approval by the Department of Building and Safety. All Conditions of Approval provided by the Department of Building and Safety shall be incorporated and printed on the plans submitted for plan check.
5. **Landscaping.** All landscaping shall be drought tolerant and native or non-invasive plant species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, or identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as "noxious weed" by the State of California or the U.S. Federal Government shall be utilized within the property.

Coastal Development Permit Special Conditions

6. **Vehicle and Equipment Cleaning.** To minimize the spread of invasive weeds, project-related vehicles and construction equipment will be cleaned prior to entering the Reserve.

7. **Work Areas.** The access road and work area will be flagged, fenced, or otherwise marked prior to construction to alert crew members of the project boundaries. The contractor will prohibit any construction-related traffic outside of these boundaries. Upon completion of the work, the flags/barriers shall be removed.
8. **Sound Walls.** SoCalGas will install sound walls around the perimeter of the work site to reduce noise and dust. Upon project completion, the sound walls will be removed.
9. **Speed Limits.** Project-related vehicles shall observe a 5-mile-per-hour speed limit within the Reserve.
10. **Trash Clean-up.** All food-related trash items such as wrappers, cans, bottles, and food scraps generated during project construction will be disposed in closed containers and removed at least once a week.
11. **Pets & Wildlife Feeding.** Pets shall be prohibited onsite, and no deliberate feeding of wildlife will be allowed.
12. **Spill Control.** If vehicle or equipment maintenance is necessary, appropriate secondary containment shall be used. Any accidental spills shall be cleaned-up immediately. All waste material shall be disposed of pursuant to appropriate methods and procedures.
13. **Storm Water Runoff.** Appropriate best management practices shall be installed to prevent storm water runoff from flowing off work area (e.g., fiber rolls, sandbags, stockpile management, etc.).
14. **Dust Control.** Disturbed areas shall be watered to minimize dust.
15. **Qualified Biological Monitor.** A qualified biological monitor will be onsite for all setup and teardown activities, and during initial grading work. The monitor shall be responsible for:
 - Construction crew training regarding environmentally sensitive areas
 - Checking for nesting and roosting behavior
 - Ensuring work limits are appropriately marked and maintained
 - Authority to stop work
16. **Protection of Breeding Birds.** All project activities shall occur outside of the bird breeding season (February 1 through August 31) to the maximum extent feasible. If project activities must occur between February 1 and August 31, a qualified biologist shall conduct a preconstruction survey within 500 feet of the project's disturbance limits, approximately one week prior to construction to determine presence/absence of active nests within and adjacent to the project construction area. If signs of breeding or nesting behavior are observed or if active nests are located, no project activities shall occur within 300 feet (500 feet for raptors) of such areas/nests. A smaller buffer of no less than 300 feet for raptors or 100 feet for other bird species may be established if the qualified biologist concurs that a modified 300/100-foot buffer would not result in significant adverse impacts to the nesting birds. No project activities shall occur in such areas until breeding/nesting is completed, the young have fledged the nest and left the area, or the nest has been abandoned.
17. **Cultural Resources.** If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a

Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained for a minimum of five years. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.

If a possible tribal cultural resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find. Following discovery, the Applicant or Owner shall immediately contact all Native American tribes that have informed the City of Los Angeles they are traditionally and culturally affiliated with the geographic area of the Project, as well as the Department of City Planning, Office of Historic Resources (OHR). If a Qualified Tribal Monitor or Archaeological Monitor determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact appears to be a potential tribal cultural resource, in its discretion and supported by substantial evidence, the Applicant and Owner shall provide any affected tribe a reasonable period of time, not less than five business days, to conduct a site visit and make recommendations to the Applicant or Owner and OHR regarding the monitoring of future Ground Disturbance Activities and the treatment and disposition of any discovered tribal cultural resources. The Applicant or Owner shall implement the tribe's recommendations if the Qualified Tribal Monitor or Archaeological Monitor reasonably concludes such recommendations are reasonable and feasible.

Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of tribal cultural resources shall occur as follows: The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Tribal Monitor or Qualified Archaeologist, as applicable.

All collected artifacts and fieldwork notes, if not human remains or other mortuary objects, shall be curated at the Natural History Museum of Los Angeles County or another appropriate curatorial facility for educational purposes. If cleared by the Qualified Tribal Monitor or Archaeological Monitor, Ground Disturbance Activities may continue unimpeded on other portions of the site. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed. A report that describes the resource and its disposition, as well as the assessment methodology shall be prepared by the Qualified Tribal Monitor or Archaeological Monitor, according to

current professional standards and maintained for a minimum of five years. A copy of the report shall be submitted to OHR, the South Central Coastal Information Center at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File. If requested by the City, OHR may review and approve any monitoring or mitigation plan prior to implementation.

If a cultural resource (e.g., shell midden, flaked stone tools, arrowheads, bones, ceramics, or historic bottles) is encountered, in addition to the above procedures, halt work in the immediate vicinity and contact SoCalGas archeologist Tricia Dodds at (213) 231-5363 or their successor. Work shall remain halted until the archaeologist provides approval to proceed consistent with the procedures outlined above of this condition. Do not relocate cultural resources. If human remains are found during any phase of the project, halt work for at least 200-feet around the discovery and contact the Los Angeles County Medical Examiner during normal business hours at (323) 343-0512 and after hours at (323) 343-0714, and contact SoCalGas Archaeologist Tricia Dodds at (213) 231-5363 or their successor. Do not take photos of human bone or associated burial items unless instructed to do so by the Coroner or a SoCalGas archaeologist.

18. **Seed Dispersal.** SoCalGas will disperse a native seed mix following the completion of the proposed abandonment work. The seed mix will be comprised of species expected to complement the restoration work planned by CDFW under their Ballona Wetlands Restoration Project. A copy of the species list has been provided to the agency.

Standard Conditions

19. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
20. Prior to the issuance of any permits, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the subject case file.

Administrative Conditions

21. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.
22. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of

Approval herein attached as a cover sheet and shall include any modifications or notations required herein.

23. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.
24. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.
25. **Department of Building and Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.
26. **Condition Compliance.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
27. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not

relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

(As Amended by the West Los Angeles Area Planning Commission at its meeting on July 1, 2026)

Coastal Development Permit

1. **The development is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Chapter 3 of the Coastal Act includes provisions that address the impact of development on public services, infrastructure, traffic, the environment and significant resources, and coastal access. Applicable provisions and findings regarding conformity with these provisions are as follows:

Section 30232 Oil and hazardous substance spills.

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

The project site is the natural gas well Vidor 15 (API: 0403714071) at the Playa Del Rey Natural Gas Storage Facility, which is located on a raised upland area within an 85-acre portion of the Ballona Wetlands Ecological Reserve south of Jefferson and Culver Boulevards. The proposed project consists of the plugging and abandonment of the natural gas well Vidor 15 at the Playa Del Rey Natural Gas Storage Facility. The well is a natural gas observation well, connected to an underground natural gas reservoir, and there are no known liquid hydrocarbons in the area that would pose a risk for spillage of crude oil, gas, or petroleum product. The applicant, Southern California Gas Company (SoCalGas), has stated that there is no foreseeable risk of oil or hazardous substance spills occurring during the well abandonment activity. They have also stated that as standard procedure, they install second containments under all mechanical equipment at well sites to prevent and contain any truck leakage or spills. Additionally, SoCalGas has provided a list of Best Management Practices (BMPs), which have been revised and included by SWCA Environmental Consultants in the substantial effects analysis technical memorandum, dated April 30, 2026, as well as a Spill Prevention and Response Plan, dated December 2025. These BMPs have been incorporated into the project scope and the conditions of approval as Coastal Development Permit Special Conditions. SoCalGas has stated that these BMPs are generally applied as standard procedures during construction activity which takes place within or adjacent to natural areas. Of these BMPs, Conditions No. 12 and 13 are designed to protect against the spillage of any hazardous materials, including secondary containments installed under mechanical equipment for spill control and the use of storm water management materials to prevent storm water runoff.

The California Department of Conservation Geologic Energy Management Division (CalGEM) regulates the construction, use, maintenance, and removal of natural gas wells like Vidor 15, and has previously identified this well as a priority well for testing or abandonment. CalGEM's concerns stem from Vidor 15 not having undergone Mechanical Integrity Testing (MIT) previously, corrosion rates measured at nearby wells that have been tested, potential strain on the well casings due to the gas well being in direct connection to the underground gas storage reservoir, and the well's proximity to the

Ecological Reserve and nearby residential areas. The purpose of the proposed plugging and abandonment of the well is to address these concerns and prevent the well from potentially failing in the future. The applicant previously received a permit from CalGEM for the well abandonment (Permit No. 7041169), which has since expired. A new or renewed permit will be required from CalGEM prior to work commencing, at which time the agency may require Mechanical Integrity Testing (MIT) be done alongside the plugging and abandonment work.

The proposed project is located in an area where the spillage of crude oil, gas, petroleum products, or hazardous substances is not anticipated. The project is also subject to existing regulations implemented and enforced by CalGEM and is conditioned to comply with the proposed BMPs to further minimize any risk of oil and hazardous substance spills within the Coastal Zone. Therefore, there is no foreseeable risk of oil or hazardous substance spills, and the purpose of the proposed work is to protect against future risk of failure of the natural gas observation well.

Section 30233 Diking, filling or dredging; continued movement of sediment and nutrients (a) *The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following: (4) Incidental public service purposes, including, but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines; (6) Restoration purposes.*

The project site is the natural gas well Vidor 15 (API: 0403714071) at the Playa Del Rey Natural Gas Storage Facility, which is located on a raised upland area within an 85-acre portion of the Ballona Wetlands Ecological Reserve south of Jefferson and Culver Boulevards. The proposed project consists of the plugging and abandonment of the well, which would include use of a workover rig to remove downhole piping and the wellhead, sealing the well with cement plugs, cutting the top portion of the well casing, sealing the well, removing all aboveground infrastructure including the chain link fence, well cellar, concrete pads, piping, and rig anchors, and dispersing a native seed mix developed for upland areas of the Ecological Reserve. Removal of the downhill piping and aboveground infrastructure will require grading consisting of 100 cubic yards of cut and fill and 75 cubic yards of soil import. The duration of the physical work is estimated to last approximately three months. Mechanical Integrity Testing (MIT) may be required alongside the plugging and abandonment work. The abandonment of the well is part of the Southern California Gas Company's (SoCalGas) long-term plan to plug and abandon their wells within the Ballona Wetlands Ecological Reserve.

The applicant provided an aquatic resources delineation report, prepared by SWCA Environmental Consultants in January 2023 and revised in January 2024. The delineation report used a combination of existing jurisdictional wetland maps and a field survey to determine the presence of any wetlands on the project site. The report found that, while the Ballona Wetlands Ecological Reserve is largely made up of low-lying wetland areas, and the well-site easement does contain previously mapped wetland boundaries, the project site and work area are bounded by the adjacent access roads and located entirely within the raised upland area containing the developed well site, characterized as "elevated compacted fill terrace", and therefore no wetlands are present on the project site nor will be impacted by the proposed project. Both "freshwater emergent wetland" areas

and “estuarine and marine wetland” areas are present around the Vidor 15 well site, however the report finds that no wetlands are located within the proposed project’s Work Area, delineated in the site plan and all SWCA’s technical reports. SWCA also performed “wetland determination sampling” at the lowest elevation within the proposed Work Area and found no indicators of wetlands within the Work Area. All proposed work will take place within the project site and within the upland area, including site delineation, any required grading, and native seed dispersal. No diking, filling, or dredging of open coastal waters, wetlands, estuaries, or lakes is proposed or permitted. SoCalGas is an investor-owned public utility that maintains an underground natural gas storage facility at and around the project site, and the proposed work is incidental to this public service, including both the testing and inspection of the existing well pipe and infrastructure, and the plugging and abandonment of the well.

Section 30240 Environmentally sensitive habitat areas; adjacent developments.

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas.

The project site is located on a raised upland area within an 85-acre portion of the Ballona Wetlands Ecological Reserve south of Jefferson and Culver Boulevards. The proposed project consists of the plugging and abandonment of the natural gas well Vidor 15 at the Playa Del Rey Natural Gas Storage Facility, including grading consisting of 100 cubic yards of cut and 100 cubic yards of fill using 75 cubic yards of imported soil, and reseeding of the well site are using a native seed mix formulated for upland areas of the Ecological Reserve. While the Ballona Wetlands Ecological Reserve is largely made up of low-lying wetland areas, the project site is located entirely within the raised upland areas that contain the developed well site and adjacent access road.

A biological and natural resources technical memorandum was prepared by SWCA Environmental Consultants (September 2023, updated February 2024) for the project site, along with a substantial effects analysis technical memorandum (April 2026) and an unusual circumstances technical memorandum (May 2026). In general, the environmental consultants characterize the well site as “disturbed, consisting of elevated sediment, sparse vegetation cover, [with] a prevalence of non-native plant species,” reducing the chance of special status species to occur. The project site contains one primary vegetation community consisting of ice plant mats, dominated by the non-native ice plant. The review area outside of the project site and work area also contain pickleweed mats, which are considered a sensitive community and therefore an Environmentally Sensitive Area (ESA or ESHA) per Section 30107.5 of the Coastal Act, and upland mustards and star-thistle fields, which are not considered a sensitive community. While the nearby pickleweed mats are a sensitive plant community alliance and qualifies as an ESA, they are located outside of the proposed work area for the project and will not be disturbed or impacted by the proposed work. The environmental consultants have suggested fencing or flagging of the vegetation area boundary of the pickleweed mats to avoid disturbance of the sensitive community. SoCalGas has identified several standard best management practices (BMP) used during all construction activities within or adjacent to natural or public areas that would delineate the work area, such as flagging and fencing of the work area and the erection of sound walls. While the SoCalGas BMPs enhance the protection for sensitive

plant communities around the work area, they have not been identified as a requirement to prevent impacts due to the sensitive plant communities being located outside of the work area.

The proposed work will require the removal of portions of the non-native ice plant mats and non-native ngaio trees within the work area on the well site. As part of the proposed work and BMPs, a native seed mix will be dispersed over the well site once the plugging and abandonment work is completed, intended to complement any potential future habitat restoration within the Ecological Reserve.

Should the proposed work take place during bird nesting season, construction activities would be subject to compliance with the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit taking of all birds and their active nests, including raptors and other migratory birds (as listed under the Federal MBTA). Implementation of required nesting bird surveys and nesting bird protection measures under the Federal Migratory Bird Treaty Act are identified by SoCalGas as a standard BMP and by the City as a standard regulatory compliance measure (RCM) to prevent any impacts to sensitive species. Therefore, as conditioned, the project will not significantly degrade or disrupt environmentally sensitive habitat areas, will remove the current development on the site, and will leave the site in a state that will be compatible with the continuance of those habitat areas.

Section 30244 Archaeological and Paleontological Resources.

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The proposed project consists of the plugging and abandonment of the natural gas well Vidor 15 at the Playa Del Rey Natural Gas Storage Facility. Any grading activity would be limited to the removal of existing well infrastructure and backfilling the space left by the removal. Grading is subject to review by the Department of Building and Safety and will comply with the requirements of the grading division.

The subject site is not located in an area with known archaeological or paleontological resources. However, if such resources are discovered during any excavation or grading activities, the project is subject to compliance with Federal, State and Local regulations already in place, and is subject to compliance with Condition No. 17 related to inadvertent discovery of cultural or archaeological resources. Pursuant to Condition 17, if previously unknown archaeological resources are found during excavation and grading, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. The project is also conditioned to comply with the proposed BMPs, which include procedures to be followed in the event of the work encountering cultural resources. If archaeological or paleontological resources are discovered during excavation or grading activities, the project is subject to compliance with Federal, State and Local regulations already in place.

Section 30250 Location; existing developed area.

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

The project site is a long-standing natural gas well site that was first permitted for drilling in 1935 and obtained by SoCalGas in 1953. The land surrounding the well site has been obtained by the State of California for management by the Department of Fish and Wildlife (CDFW) as the Ballona Wetlands Ecological Reserve. The project site is the natural gas well Vidor 15 well site, which currently maintains a natural gas observation well. The proposed project involves the plugging and abandonment of the existing natural gas well, resulting in the removal of the well infrastructure from the well site, and will include seeding of the site with a native seed mix. The project is part of a long-term plan by SoCalGas to abandon their wells within the Ecological Reserve. Abandonment of the wells would also allow for potential future habitat restoration. No new wells or structures are proposed, and the abandonment of the Vidor 15 well will result in a net reduction of natural gas wells within the Ballona Wetlands Ecological Reserve. As such, the project will be located in an existing developed area but will result in the removal of the current land use and development on the project site and a reduction of the current development within a designated Ecological Reserve.

Section 30251 Scenic and Visual Qualities.

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The project is located near the center of an 85-acre portion of the Ballona Wetlands Ecological Reserve south of the intersection of Jefferson and Culver Boulevards. The proposed project consists of the plugging and abandonment of the natural gas well Vidor 15 at the Playa Del Rey Natural Gas Storage Facility, including grading consisting of 100 cubic yards of cut and 100 cubic yards of fill using 75 cubic yards of imported soil, and reseeding of the well site are using a native seed mix formulated for upland areas of the Ecological Reserve. The project is located more than 500 feet from the northern property line, more than 240 feet from the nearby SoCalGas-owned Playa Del Rey Natural Gas Storage Facility to the south, and more than 1,100 feet from the nearest residential property. The Ballona Wetlands are flat with low-lying wetland areas dotted with slightly raised upland areas which mostly contain infrastructure. The project site is the Vidor 15 well site, situated on one of the upland areas and next to an access road used by SoCalGas.

The proposed project will result in the removal of the well infrastructure from the site and will require removal of portions of the non-native ice plant mats and ngaio trees with the proposed work area, the area of which will be reseeded with a native seed mix. The well site is currently partially obscured by the ngaio trees from the road but is clearly visible from viewpoints along the top of the nearby Westchester Bluffs. The removal of the well infrastructure and the replacement of portions of the non-native plant communities with native plants will enhance the scenic and visual qualities of the well site and surrounding wetlands as seen both from the road and from the nearby bluffs. The applicant is proposing to use temporary sound walls to separate the work area from the surrounding wetlands, which will temporarily obscure views, but will be removed once the work is complete. No new structures are proposed, and no previously unobstructed views will be obstructed to or along the wetlands, nearby bluffs, or the ocean. Minor grading will be required to remove the well infrastructure and fill in the location of the well cellar, but it will not alter any natural landforms.

Section 30252 Maintenance and Enhancement of Public Access.

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project site is located approximately one mile from the Pacific Ocean and 4,500 feet from the edge of Playa Del Rey Beach, situated on an upland terrace consisting of compacted elevated sediment within the Ballona Wetlands Ecological Reserve. The project site is reached via an access road along an upland embankment connecting Jefferson Boulevard to the north and SoCalGas's "Tank Farm" property to the south. The access road may be located along the shoreline because high-tide waters may reach portions of the road. However, the road is located within the Ballona Wetlands Ecological Reserve and is subject to management by the CDFW. The applicant has stated that SoCalGas will need a right-of-entry permit from CDFW to conduct the proposed work using portions of the access road and upland terrace located outside of the well site easement. The proposed work will occur entirely within the upland terrace and adjacent access road and will remove the existing development, so it will not interfere with any public access to the coast. No new structures, development, or land use are proposed, so no parking is required or proposed. No permanent structures would be placed within the public right-of-way and public access to the coast would not be impacted.

Section 30253 Minimization of Adverse Impacts.

New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. (4) Minimize energy consumption and vehicle

miles traveled. (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The project site is located within a Very High Fire Hazard Severity Zone, a Methane Zone, a 500-year Flood Zone, a Special Grading Area, within 7.1 kilometers from the Newport – Inglewood Onshore Fault Zone, and within a Landslide and Liquefaction hazard area. However, the proposed project will plug and abandon the existing natural gas well on site, removing the existing development from the site, and no new development is proposed. The worksite will be subject to compliance with the requirements of the Flood Hazard Management Specific Plan, as well as Zoning, Building, and Fire Safety Code requirements that will minimize risks to life and property in flood, geologic, methane, and fire hazard areas.

The project site is also located within an area that may be affected by Sea Level Rise. On August 12, 2015, the Coastal Commission adopted a Sea Level Rise Policy Guidance document, updated and adopted On November 7, 2018. This policy document provides a framework and directions for local jurisdictions to address sea level rise (SLR) in Local Coastal Programs (LCPs) and Coastal Development Permits (CDPs). The Our Coast, Our Future Hazard Map was utilized to analyze the project's vulnerability to flood hazards, considering a scenario of a minimum 6.6-foot sea level rise and a 100-year storm scenario. Based on this scenario, the project site could potentially be affected by flooding as a result of SLR, however, the project proposes to remove all existing development on the site and reseed the land with a native seed mix developed for upland areas within the wetland. Wetland environments are adapted for occasional coastal flooding and are recognized by the California Coastal Commission as an important resource for flood protection of our coastal cities [Source link: <https://www.coastal.ca.gov/water-quality/nps-management/wetlands.html>].

The proposed project would have no adverse impacts on public access, recreation, public views or the marine environment, as the property site is a currently developed well site and the development is proposed to be removed. The well site is located within the Ballona Wetlands Ecological Reserve nearly a mile from the ocean, and the proposed project includes reseedling of the project site with a native plant seed mix once the plugging and abandonment work is complete. The project will neither interfere nor reduce access to the shoreline or beach. There will be no dredging, filling or diking of coastal waters or wetlands associated with the request, and there are no sensitive habitat areas, archaeological or paleontological resources identified on the site. The proposed project will not block any designated public access views.

As conditioned, the proposed project is in conformity with Chapter 3 of the California Coastal Act.

2. **The development will not prejudice the ability of the City of Los Angeles to prepare a local coastal program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Coastal Act Section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act.

Currently, the City does not have an approved Local Coastal Program for the Westchester – Playa Del Rey area. In the interim, the Westchester – Playa Del Rey Community Plan, a portion of the Land Use Element of the City's General Plan, serves as the functional equivalent which contains the applicable land use policies and goals for the portion of the Coastal Zone where the project is located; the project is also subject to the regulations of the Playa Vista Area B Specific Plan. The Westchester – Playa Del Rey Community Plan designates the property for Open Space land use with a corresponding zone of OS(PV). The Playa Vista Area B Specific Plan and the OS(PV) zone allow the continued use of the existing SoCalGas facilities and habitat management within the Ballona Wetlands, and the proposed project would remove the existing natural gas well Vidor 15 and disperse a native seed mix developed for the Ballona Wetlands upland areas. The proposed project is consistent with the underlying zone and the policies of the City's Land Use Element. Furthermore, as discussed in Finding No. 1, the project is consistent with the Chapter 3 policies of the Coastal Act. As conditioned, the proposed project will not prejudice the ability of the City to prepare a Local Coastal Program.

3. **The Interpretive Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed and considered in light of the individual project in making this determination.**

The Los Angeles County Interpretative Guidelines were adopted by the California Coastal Commission (October 14, 1980) to supplement the Statewide Guidelines. Both regional and statewide guidelines, pursuant to Section 30620 (b) of the Coastal Act, are designed to assist local governments, the regional commissions, the commission, and persons subject to the provisions of this chapter in determining how the policies of this division shall be applied to the coastal zone prior to the certification of a local coastal program. As stated in the Regional Interpretative Guidelines, the guidelines are intended to be used "in a flexible manner with consideration for local and regional conditions, individual project parameters and constraints, and individual and cumulative impacts on coastal resources."

The Regional Interpretive Guidelines, Ballona Wetlands land use guidelines, address the existing wetlands and open space areas, wildlife habitat areas, compatible development and buffering, and public access. The project consists of the plugging and abandonment of the existing natural gas well Vidor 15, which will involve the use of temporary equipment and sound walls and minor grading and fill, and reseeding of the cleared well site with a native seed mix developed for upland areas of the Ballona Wetlands Ecological Reserve. The Regional Interpretive Guidelines have been reviewed, analyzed, and considered with regard to the individual project in making this determination, and the project as conditioned is consistent with such Guidelines.

4. **The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.**

The proposed project consists of the plugging and abandonment of the well, which would include use of a workover rig to remove downhole piping and the wellhead, sealing the well with cement plugs, cutting the top portion of the well casing, sealing the well, removing all aboveground infrastructure including the chain link fence, well cellar, concrete pads,

pipings, and rig anchors, and dispersing a native seed mix developed for upland areas of the Ecological Reserve and is located within the Dual Permit Jurisdiction area of the Coastal Zone, where the local jurisdiction (City of Los Angeles) and Coastal Commission issues Coastal Development Permits. The Coastal Commission will render decisions on appeals of the City's Coastal Development Permits or Coastal Exemptions. The Coastal Commission took action on the similar projects in the Playa Del Rey Coastal Zone:

On July 12, 2024, the Coastal Commission approved with conditions a Coastal Development Permit for mechanical integrity testing and/or abandonment of the Del Rey 4 and Del Rey 9 wells, both part of Southern California Gas Company's underground natural gas storage facility on property located within the Ballona Wetlands Ecological Reserve north of Culver Boulevard (Application No. 9-23-0817).

On November 17, 2023, the Coastal Commission approved with conditions a Coastal Development Permit for construction of an approximately 244-ft. long colored and textured retaining wall, ranging in height from 4ft. to 7ft. with a soldier pile and lagging system design at the base of the bluff within the existing natural gas facility located at 8141 Gulana Avenue (Application No. 5-23-0193).

On July 27, 2015, the Coastal Commission granted a permit exemption in conjunction with the excavation of four pits for soil testing within the existing natural gas facility located at 8141 Gulana Avenue (Application No. 5-15-0239-X).

On October 29, 2013, the Coastal Commission granted a waiver of CDP in conjunction with the removal of a metal shed and replacement with two separate metal sheds within an existing facility located at 7900 Falmouth Avenue in Playa del Rey (Application 5-13-0765).

On January 11, 2012, the Coastal Commission approved a CDP for the installation of an above-grade 24-foot-high pipe truss support system throughout the existing natural gas processing facility, and removal of invasive plants and relandscaping with native plants in a 0.46-acre area, located at 7900 Falmouth Avenue in Playa Del Rey (Application No. 5-11-237).

Previous decisions by the Coastal Commission have approved Permits for similar projects that comply with the applicable provisions of Chapter 3 of the Coastal Act. As such, this decision of the permit granting authority has been guided by applicable decisions of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code, which provides that prior decisions of the Coastal Commission, where applicable, shall guide local governments in their actions in carrying out their responsibility and authority under the Coastal Act of 1976.

5. **The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, and the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

Section 30210 of the Coastal Act states the following in regards to public access:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and

recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, right of private property owners, and natural resources from overuse.

Section 30211 of the Coastal Act states the following in regards to public recreation policies:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

The subject property is located within the Ballona Wetlands approximately one mile from the Pacific Ocean and 1,400 feet from Ballona Creek. Despite the distance to the water, the project could have a cumulative effect on public access to the coast if it resulted in a loss of on-street parking spaces or did not provide adequate parking. The existing natural gas well Vidor 15 is accessed by SoCalGas using a paved access road with adequate space for parking on the well site and the nearby SoCalGas facility at 7900 S. Falmouth Avenue. The proposed project will remove the existing natural gas well, and no other land uses are proposed. Therefore, no parking is required for the proposed project, and the project will not interfere with on-street parking or public parking lots. As proposed, the project will not conflict with any public access or public recreation policies of the Coastal Act.

6. An appropriate environmental clearance under the California Environmental Quality Act has been granted.

A Categorical Exemption, ENV-2024-1589-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act and the City CEQA Guidelines. The project proposes the plugging and abandonment of natural gas well Vidor 15 (API: 0403714071) at the Southern California Gas Company (SoCalGas) Playa Del Rey Natural Gas Storage Facility, located within an upland area of the Ballona Wetlands Ecological Reserve, including use of a workover rig to remove piping and the wellhead, setting cement plugs, cutting of the top portions of the well casing, sealing the well with identifying information, and reseeded the project site with a native seed mix. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines, Section 15301 (Class 1).

The Class 1 Categorical Exemption, for Existing Facilities, consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. This includes (b) existing facilities of both investor and publicly owned utilities used to provide electrical power, natural gas, sewerage, or other public utility services. The project involves the minor alteration of an existing well maintained by an investor-owned natural gas utility for the purpose of abandoning the well. The project would not expand the existing use of the well, as the project will abandon and discontinue its use.

The project involves removal, plugging, and abandonment of the existing natural gas well on a site located within the Ballona Wetlands Ecological Reserve, a designated wildlife management area, for the purpose of allowing potential future habitat restoration. The well pad area is elevated above the aquatic wetland areas and is large enough to

accommodate the required equipment, and a natural resources biological survey (prepared by SWCA Environmental Consultants, dated 9/25/2023, updated February 2024) and tree disclosure statement (dated 6/7/2024) were provided demonstrating that the proposed work will not have a significant effect on any sensitive or scenic biological resources.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

Furthermore, the Exceptions outlined in the State CEQA Guidelines Section 15300.2 do not apply to the project:

- (a) *Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

The location exception does not apply to Class 1 categorical exemptions. The proposed project qualifies for a Class 1 categorical exemption. Therefore, this exception does not apply.

- (b) *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The applicant, SoCalGas, maintains several natural gas wells located within the boundaries of the Ballona Wetlands Ecological Reserve. However, the wells are not located in close proximity to one another and are utilized independently of one another. Each well has its own well-site easement, and several of them are located on separate lots. The proposed plugging and abandoning of the natural gas well Vidor 15 will reduce environmental hazards associated with oil and gas extraction and clear the well site for potential future habitat restoration. The proposed project also includes reseeding of the upland area occupied by the well with a native seed mix developed for compatibility with the Ecological Reserve and therefore will not result in significant impacts to the environment. The applicant has stated that the proposed project is part of SoCalGas's long-term plan to plug and abandon their wells within the Ballona Wetlands Ecological Reserve, which would result in the reduction of environmental hazards associated with the wells within the reserve land.

The potential for cumulative impacts was analyzed by the applicant's environmental consultant, SWCA, within the substantial effect analysis technical memorandum (April 30, 2026) and the unusual circumstances technical memorandum (May 28, 2026). The reports note that, as of March 2026, SoCalGas has completed five well abandonments within the Ballona Wetlands Ecological Reserve, none of which resulted in significant environmental impacts, including Del Rey 4, 14, 17, and 19 and Vidor 5. The proposed project would also be conducted on its own without other plugging and abandonment projects happening at the same time. SWCA also considered project-related noise and vibration in relation to ambient noise in the vicinity and the potential effects on sensitive wildlife. As the project-related noise and vibration would be temporary and occur

intermittently, they concluded that the project would not result in cumulative noise or vibration impacts on adjacent environmental resources. Lastly, they conclude that there is no anticipated significant cumulative impact as a result of the proposed plugging and abandonment of the Vidor 15 well and past or future abandonments within the Reserve because the individual plugging and abandonment projects have not resulted in and are not anticipated to result in significant impacts.

Therefore, while there is a known succession of projects of the same type, they are not all located in the same place as the subject project, and the project activities will not result in a significant cumulative impact on the environment. Additionally, the project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter, if required, for the proposed project and as it may be subsequently amended or modified. Therefore, in conjunction with citywide RCMs and compliance with other applicable regulations, no foreseeable cumulative impacts are expected.

- (c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

The proposed project consists of activities typical of natural gas well plugging and abandonment, will follow the standard procedures of SoCalGas, an investor-owned utility, and is regulated by the California Department of Conservation Geologic Energy Management Division (CalGEM).

The applicant submitted an unusual circumstances technical memorandum prepared by SWCA Environmental Consultants (May 28, 2026), which analyzed whether the conditions at the project site differ from typical projects in a way that would result in significant effects. The project site, the Vidor 15 well site, is located within an upland portion of the Ballona Wetlands Ecological Reserve and is one of several natural gas wells operated by the applicant, SoCalGas, within the Reserve as part of the Playa Del Rey Natural Gas Storage Facility. SWCA notes that the well site is physically separate from the other well sites in the Reserve and other nearby SoCalGas infrastructure and that, as of March 2026, SoCalGas has completed five similar well abandonments within the Reserve, including Del Rey 4, 14, 17, and 19 and Vidor 5, which were completed using comparable equipment and methods and did not result in significant environmental impacts. They also found that conditions at the Vidor 15 well site and proposed work area are typical of previously developed well sites, with an existing well pad located on previously disturbed compacted upland fill and vegetated primarily by nonnative vegetation and lacking environmentally sensitive habitat areas. SWCA conclude that, because the project will occur within a previously disturbed upland area outside of the wetland and environmentally sensitive habitat areas, using standard equipment and well abandonment procedures regulated by CalGEM and using standard best management practices (BMPs), there is no substantial evidence that unusual circumstances exist.

Furthermore, although the project site is located in an upland portion of the Ballona Wetlands, the approval of prior well closures in the area demonstrate that a well closure project is not an unusual circumstance. Even so, specific Regulatory Compliance Measures (RCMs) in the City of Los Angeles regulate development in

these particular types of “sensitive areas and serve to reduce any potential impacts to less than significant. Specifically, the following RCMs may apply:

- Regulatory Compliance Measure RC-GEO-1 (Seismic): The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.
- Regulatory Compliance Measure RC-GEO-3 (Landslide Area): Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
 - ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures

The project shall comply with the conditions contained within the Department of Building and Safety’s Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- Regulatory Compliance Measure RC-GEO-4 (Liquefaction Area): The project shall comply with the Uniform Building Code Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
 - ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

The project shall comply with the conditions contained within the Department of Building and Safety’s Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- Regulatory Compliance Measure RC-HAZ-2: Explosion/Release (Methane Zone): As the Project Site is within a methane zone, prior to the issuance of a building permit, the Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent

or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval.

- Regulatory Compliance Measure RC-WQ-6 (Flooding/Tidal Waves): The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.
- Regulatory Compliance Measure for California Oil and Gas Permits: The project shall obtain a Well Abandonment Permit from the California Department of Conservation, Geologic Energy Management Division (CalGEM) and comply with all conditions and requirements of that permit before, during, and after the well abandonment work.
- Regulatory Compliance Measure for Projects Located on or Near a State Ecological Reserve: As the Project Site is within the boundaries of a State ecological reserve, the project shall obtain a right of entry permit and/or other required permits from the California Department of Fish and Wildlife for all well removal activity conducted within ecological reserve land.

These RCMs have been historically proven to work to the satisfaction of the City to reduce any impacts from the specific environment in which the Project is located. Furthermore, the Project must comply with the California Building Code and the City's Landform Grading Manual.

Although the project is located within the Ballona Wetlands Ecological Reserve, the upland area containing the well-site easement, access road and perimeter paths, and the SoCalGas property to be used as a staging area, are not identified as environmental resources. The well pad area is elevated above the aquatic wetland areas and is large enough to accommodate the required construction equipment. Additionally, a Biologist's Statement of Biological Resources was prepared by SWCA Environmental Consultants on September 8, 2025, which was submitted with a natural resources biological survey (dated 9/25/2023 and updated February 2024) and aquatic resources delineation report (dated January 2023 and updated January 2024) also prepared by SWCA Environmental Consultants, and a tree disclosure statement (dated 6/7/2024) were provided stating that the proposed work will not have a significant effect on any sensitive or scenic biological resources. Pickleweed mats, considered a sensitive natural community, can be found near the project site but are located outside the work area at lower elevations and will be separated from the construction activity by the proposed construction sound barrier that SoCalGas uses as standard procedure for construction activities. The well-site easement and work area are primarily vegetated with non-native ice plant mats and ngaio trees. No protected trees are located on the project site, and while several ngaio trees are proposed to be removed, they are not a native or protected species. The proposed project will result in the plugging and abandonment of the existing natural gas well, subject to review and approval by CalGEM, including the removal of all the ground level structures and much of the downhole piping, and the subsequent reseeding of the site with a native seed mix developed for the upland areas of the Ecological Reserve. The project will also require a right-of-access permit from the California Department of Fish and Wildlife (CDFW). Therefore, in conjunction with the above and

compliance with other applicable regulations, the project will not result in a significant impact due to unusual circumstances.

Therefore, no unusual circumstances are present or foreseeable.

- (d) *Scenic Highways. A categorical exemption shall not be used for a project, which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The project site is not located on or near a designated state scenic highway.

- (e) *Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The project site is not identified as a hazardous waste site nor is it on any list compiled pursuant to Section 65962.5 of the Government Code.

- (f) *Historical Resources. A categorical exemption shall not be used for a project, which may cause a substantial adverse change in the significance of a historical resource.*

The subject site and existing structure have not been identified as a historic resource or within a historic district (SurveyLA, 2015), the project is not listed on the National or California Register of Historic Places or identified as a Historic Cultural Monument (HCM).

Therefore, the project is determined to be categorically exempt and does not require mitigation or monitoring measures; no alternatives of the project were evaluated. An appropriate environmental clearance has been granted.

ADDITIONAL MANDATORY FINDING

The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 186,952, have been reviewed and it has been determined that this project is located in Zone X, areas of 0.2 percent annual chance of flood hazard, or 500 year flood hazard areas. The project shall conform with both the applicable specific provisions and the intent of the Floodplain Hazard Management Ordinance.