Response to PEA Completeness Review, September 2023

Ventura Compressor Modernization Project

NOVEMBER 2023

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1 Introduction

1.1 Overview

Southern California Gas Company (SoCalGas) prepared and submitted to the California Public Utilities Commission (CPUC) the Application for a Certificate of Public Convenience and Necessity (CPCN) for the Ventura Compressor Station Modernization Project (Project). CPUC General Order (GO) 177 for Gas Infrastructure requires that all applications for CPCNs include an Applicant-prepared Proponent's Environmental Assessment (PEA). SoCalGas submitted the CPCN Application (A.23-08-019) and PEA to the CPUC on August 24, 2023.

The CPUC provided its PEA Completeness Review for the Project on September 22, 2023. All deficiencies and completeness items identified by the CPUC are required to be addressed before the PEA can be deemed complete.

This Response to Comments responds to and provides the information requested in the PEA Completeness Review.

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2 Responses to CPUC's Comments

The information provided below is in response to the request for additional information detailed in the CPUC and Aspen Environmental Group's September 2023 Completeness Review Letter. Each CPUC/Aspen information request is summarized below, followed by SoCalGas' response.

Revisions to the PEA are shown below as excerpts from the PEA text. Added or modified text is in double-underline format, while deleted text is shown as strikeout text ~~(example)~~.

2.1 Deficiency Area No. 1, Hazard and Public Safety

CPUC Comment #1: Provide details for both the existing facilities and proposed Project, to establish how the proposed site improvements compare with the existing conditions, for the safety systems.

Response to CPUC Comment #1 – Section 3.2.1.1 of the PEA was revised as follows to address the comment:

3.2.1.1 Project Safety

Safety is the foundation of SoCalGas's business and guides its efforts as a fundamental core value. SoCalGas focuses on safety through the lenses of public safety,[1] system safety,[2] employee safety,[3] and contractor safety.[4] This tradition of safety spans more than 150 years and is the basis for company programs, policies, procedures, guidelines, and best practices.

SoCalGas defines safety as the presence of controls for known hazards, actions to anticipate and guard against unknown hazards, and the commitment to continuously improve SoCalGas's ability to recognize and address hazards. SoCalGas's practices advance and enhance a comprehensive approach to safety through hazard identification, hazard and risk controls and addressing them, continuous learning and improvement, leadership commitment, and employee engagement.

SoCalGas strives to continuously improve and strengthen its safety performance by setting clear, measurable goals; assessing safety performance; reviewing and questioning approaches and assumptions; integrating people and activities to promote a common approach to safety; and learning from and sharing best practices and lessons learned with stakeholders, including peers. This safety commitment has guided SoCalGas's past and current practice and will continue to guide its future direction.

Tables 3-1 through 3-4 below provide a side-by-side comparison of the safety systems for the existing facilities as well as the proposed Project.

1 Safety systems and processes focused on protection of SoCalGas's customers and the public (i.e., Emergency Management, Environmental Safety, Customer Data Privacy, Accessibility, and protection of the public from harm caused by its operations or its assets).
2 Safety systems and processes associated with the design, construction, operation, inspection, and maintenance of SoCalGas's infrastructure.
3 Safety systems and processes focused on the health and safety of SoCalGas's employees. This includes safety policies, programs, and training.
4 Safety systems and processes focused on the safety and protection of SoCalGas's contractors and subcontractors who provide services to support SoCalGas assets and operations.

Table 3-1. Emergency Shutdown System

Emergency Shutdown (ESD) System	Existing Station	Proposed Project
Equipment that is activated by the ESD including the intended action (activate/deactivate or open/close)	The Existing Station was designed per 49 CFR Ch. 1, Section 192, as it existed at that time. When an ESD is activated, all major equipment (such as gas compressors or gas cooler) is de-energized and all supporting utilities (lube oil system, instrument & utility air systems etc.) are shut down unless required by machinery protection procedures. The existing facility ESD control system utilizes two pneumatic control loops (ESD No. 1 and ESD No. 2) to initiate and control the emergency shutdown system: ESD No. 1 control loop is the system connected to all fire and gas detection and manual initiation equipment to signal the activation of an emergency shutdown. ESD No. 2 control loop is the system of block valves that evacuates the gas from the compressor station piping to the blowdown sub-header and to the blowdown stack. The system consists of detection equipment comprised of quartzoid bulbs, natural gas detectors, and a fire detection system. A series of manually operated valves and switches are strategically placed throughout the plant. The ESD station isolation valves are actuated by instrument air in a fail-safe configuration. The system is designed to perform the following functions: ▪ Isolate main unit fuel gas ▪ Isolate main gas lines into and out of the compressor station	The ESD system for the proposed Project will be designed consistent with the requirements of 49 CFR Ch. 1, Section 192. In the event of an emergency, ESD isolation valves will close to isolate the piping systems and associated equipment, ESD blowdown valves will open to depressurize by venting the trapped gas to a safe location and cut off power to compressors and associated equipment. The ESD system design will include the intended action to stop the facility or equipment (such as the compressors or gas cooler), activate/deactivate associated equipment, or open/close valves to stop the flow of gas and vent gas to the blowdown stack. The ESD system is designed to react quickly to shutdown gas supply, evacuate gas from connected equipment, and de-energize non-essential electrical systems. The new station will be designed with redundancy to add an additional layer of safety.

Table 3-1. Emergency Shutdown System

Emergency Shutdown (ESD) System	Existing Station	Proposed Project
	▪ Discharge gas from blowdown piping at a location that will not create a hazard ▪ Shut-in gas compression equipment and non-emergency electrical facilities in the vicinity of gas headers and in the compressor building	
Activation modes (automatic or manual) and what conditions could energize the ESD automatically	The ESD system of the existing facility can be initiated automatically or manually. A combination of switches, handles, and pull buttons can be used to activate a manual ESD. Natural gas detectors and flame/fire detectors that are part of the fire detection system are used to detect gas leaks, flashes, and fires and activate an automatic ESD.	Automatic and manual activation modes will be designed to initiate the ESD system. Fire and gas detection system will be designed to initiate an automatic ESD.
Classification of the ESD as a safety instrumented function (SIF) and specified safety integrity level (SIL) rating	The existing facility's ESD system is primarily comprised of pneumatic control and not entirely subject to SIL rating. The existing ESD safety system follows typical compressor station design with pneumatic activation via ESD loops, manual pull stations, and components that are proven-in-use and are properly operated, inspected, tested, maintained, and operated in a safe manner compliant with International Electrotechnical Commission (IEC) and Occupational Safety and Health Administration Process Safety Management requirements. The existing facility was commissioned in 1988. The IEC 61511-1 (International Society of Automation [ISA] 84) standards that drive the classification of SIL ratings on SIF systems was released on September 2004 with the following guidance for existing facilities: "For existing Safety Instrumented Systems (SIS) designed and constructed in	SoCalGas designs facilities in accordance with recommended practices, codes, and standards to ensure safe operations. ISA 84.00.01, Functional Safety: Safety Instrumented Systems for the Process Industry Sector, will be used as applicable in the design of the facility. While ISA 84 does not provide guidance on natural gas compressor station SIL rating, SoCalGas may utilize components that are SIL rated based upon detail design development of the proposed Project.

Table 3-1. Emergency Shutdown System

Emergency Shutdown (ESD) System	Existing Station	Proposed Project
	accordance with code, standards, or practices prior to the issue of this standard the user shall determine that the equipment is designed, maintained, inspected, tested, and operating in a safe manner."	

Table 3-2. Pressure Relief Devices

Pressure Relief Devices (PRD)	Existing Station	Proposed Project
Type of PRDs	The PRDs in the Ventura Compressor Station are composed of conventional spring loaded and pilot operated relieving devices.	Mechanical PRDs will be used to provide overpressure protection. The type of relief valve will be determined based on the operating and relieving conditions of the system, as well as applicable codes and regulations. Relief valves are typically conventional spring loaded, but a pilot operated valve may be used.
Sizing contingencies in relation to American Petroleum Institute (API) Standards 520 and 521	These valves were designed, built, and installed in 1988. They are sized and designed as per ASME Section VIII regulations and have the ASME Code 'UV' and 'NB' stamps to confirm adherence to National Board of Boiler and Pressure Vessel requirements. The API 520 and 521 contingencies for which these PRDs are sized are for either a blocked discharge or fire case scenario.	The sizing and installation of relief valves will be per applicable codes (API, ASME, etc.) or local regulations (Cal/OSHA, etc.). Overpressure scenarios (such as fire loads, control valve failure, reverse flow past pumps, reverse flow past compressors) will be identified from a detailed review of the system to identify all potential sources of overpressure; consider start-up, shutdown, and intermittent plant operations; and consider any pressure-related items from the Hazard and Operability Analysis review.
Set pressure as a percentage of maximum allowable operating pressure (MAOP)	The PRDs provide protection for either the line MAOP or, if protecting a pressure vessel, the maximum allowable working pressure (MAWP) of the vessel. For the PRDs protecting pressure vessels, the setpoint is at 100% MAWP, and for the PRDs protecting line MAOP, the PRD setpoint is at 100% MAOP.	The relief valve set pressure and other characteristics of the device shall meet applicable code requirements for all process and utility pressure vessels and equipment. The pressure relief valve will be set to no higher than MAOP for piping and MAWP for equipment or the lowest pressure

Table 3-2. Pressure Relief Devices

Pressure Relief Devices (PRD)	Existing Station	Proposed Project
		rating of any component within the system.
Approximate installation locations for the PRDs	The PRDs are located on the intake scrubber, at each of the three compressor units (on compressor discharge to cooler), and on the fuel gas header.	These PRDs will be strategically placed to protect piping and equipment based on the evaluation of segments of the plant that have a credible overpressure scenario. PRDs would be located on the intake scrubber, compressor discharge lines, fuel gas line, and discharge scrubber.
Discharge location if different than the blowdown stack	Each PRD has its own vent located at the PRD.	PRD discharge will relieve to a safe location in adherence with API 521 where it will not create a hazard.

Table 3-3. Gas Detection Sensors

Gas Detection Sensors and Systems	Existing Station	Proposed Project
Number of sensors and type	The gas detection system for the existing station is designed per 49 CFR 192. There are three gas detectors located directly above each compressor unit. These are General Monitors Model S104 gas detectors. There are a total of six fire detectors in the existing gas compressor building. Three are located on the east wall and other three are located on the west wall of the compressor building pointed towards the compressors. These detectors are Omniguard Model 860 (ultraviolet/infrared type).	The gas detection system for the proposed Project will be designed per 49 CFR 192.736. The compressor building will be equipped with gas detectors, strobe lights, and horns. The following are key design requirements per SoCalGas fire and gas detection system design criteria: There shall be fire detectors and gas detectors dedicated to each compressor unit. There shall be an open path gas detector above the compressors. Building interior and exterior shall have strobe lights and horns. The new fire and gas system is planned to have multi-spectrum infrared sensors, which will have greater capabilities and more advanced features than the detectors used at the existing facility.
Approximate placement of sensors in the site building including elevation	The gas detectors are located directly above each main compressor unit, approximately 28 feet from floor grating.	As part of detailed engineering, once the 3D model of the plant is finalized, the location of the detectors/sensors (elevation, azimuth, angle) is optimized by a process called

Table 3-3. Gas Detection Sensors

Gas Detection Sensors and Systems	Existing Station	Proposed Project
	The fire detectors are located approximately 12 feet above the floor grating.	mapping, which recommends ways to ensure proper coverage. Through mapping, the appropriate types and quantities of detectors that provide the desired coverage can be determined.
Alarm and activation setpoints	Alarm on the gas detectors is set at 25% lower explosive limit (LEL) and emergency shutdown (ESD) at 50% LEL. The fire detectors initiate an ESD when fire is detected.	Alarm on the gas detector will be set at 25% LEL and ESD at 40% LEL. The fire detectors initiate an ESD when fire is detected.
Calibration frequency	The calibration frequency of the gas detectors is quarterly.	SoCalGas standard calibration frequency is quarterly but for instruments or detectors that require shorter frequency, the calibration will be set as per the vendor recommendations. This will be determined during the detailed engineering design phase and will be indicated in the operations manuals of the facility.

Table 3-4. Vibration Monitoring System

Vibration Monitoring System	Existing Station	Proposed Project
Narrative for compressor and gas engine vibration monitoring system	The existing plant has a total of six vibration switches (Murphy Model VS2EX) installed on the existing compressors (two per unit). For each unit, one vibration switch is installed on the compressor frame and one on the engine. The vibration switches are shock-sensitive mechanisms that initiate a compressor shut down on high vibration. The switches use a magnetic latch to ensure reliable operation. A set of contacts is held in a latched position through a mechanical latch and magnet mechanism. A shock/vibration will move the magnet beyond this holding position, thus freeing the	The vibration monitoring system for the new compressors has not been designed/selected. Based on current SoCalGas design standards and specifications, the vibration monitoring system is defined as follows: The vibration monitoring systems are classified as continuous vibration protection (alarms/shutdown) and monitoring and periodic or as needed sampled vibration and condition monitoring. Ideally, for continuous vibration monitoring protection, minimum two vibration switches/transmitters would be installed on the driver (motor or gas engine) and minimum one vibration switch/transmitter on the

Table 3-4. Vibration Monitoring System

Vibration Monitoring System	Existing Station	Proposed Project
	spring-loaded tripping latch to transfer the contacts and shut down the compressor. Sensitivity is obtained by adjusting the size of the air gap between the magnet and the latch arm plate.	compressor frame. The alarm and trip setpoints are programmed directly into the unit control panel for the compressor. The compressors are also planned to be designed with a Machine Monitoring/Protection system as per API 670.

CPUC Comment #2: Provide details supporting the pipeline inspection history and show: whether inspections were visual or instrumented; identify the test methods used; and summarize the results of inspections and whether any corrective actions, replacements, or repairs were implemented.

Response to CPUC Comment #2: Appendix Q, Pipeline Repair/Replacement and Inspection, was updated to address this comment. The updated Appendix Q is attached. In addition, Section 5.9.1.5, Pipeline History, in Section 5.9, Hazards, Hazardous Materials, and Public Safety, was revised as follows:

5.9.1.5 Pipeline History

SoCalGas operates the Ventura Compressor Station in compliance with applicable codes, standards, and requirements including U.S, Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) and CPUC General Order (GO) 112-F regulations. Title 49 of the Code of Federal Regulations (CFR), Chapter D, Subpart 192, codifies the PHMSA rules, which prescribe the minimum safety requirements for pipeline facilities and the transportation of gas~~, including pipeline facilities and the transportation of gas~~. CPUC GO 112-F presents the state requirements concerned with safety of the general public and employees to the extent they are affected by basic design, quality of materials, and workmanship, and requirements for testing and maintenance of gas transmission facilities. As a prudent operator, SoCalGas also performs routine inspections that are not mandated by regulations, such as proactive leak detection, to address potential equipment maintenance outside of prescribed regulatory timelines.

There are two transmission pipelines that enter the Ventura Compressor Station ("suction" or "inlet" pipelines) and two transmission pipelines that exit the station ("discharge" or "outlet" pipelines). See Appendix Q, Pipeline Repair/ Replacement and Inspection, for additional information regarding recent pipeline replacement and inspections.

These pipelines are inspected and/or tested at least every 7 years in compliance with applicable requirements. The most recent inspections of the inlet pipelines occurred in 2007, 2014, and 2021. No anomalies were discovered. The most recent inspections of the outlet pipelines occurred in 2012, 2017, 2019, and 2022. No anomalies were discovered. Pipeline locational data is available through the National Pipeline Mapping System (NPMS; PHMSA 2023) and on the SoCalGas website (SoCalGas 2023).

Appendix Q includes the Ventura Compressor Station leak survey and Leak Detection and Repair inspection summaries for the past 5 years for the facility pipelines. Both classifications of inspections are completed using leak detection instruments.

Site-specific safety and inspection history is not tied to SoCalGas's Risk Assessment and Mitigation Phase (RAMP). SoCalGas has operated the Ventura Compressor Station in compliance with all applicable codes, standards, or requirements, including Department of Transportation PHMSA (49 CFR, Chapter D, Subpart 192) and CPUC GO 112-F rules and regulations. CPUC Safety and Enforcement Division (SED) conducted compliance audits in April 2017 and February 2022. The SED audits included a review of the compressor station's leak survey, patrol, cathodic protection, valves, overpressure protection (relief and shutdown valves), emergency shut down (ESD) system, and gas detection and alarm systems inspection records for the last 10 years. In addition, SED staff reviewed operator qualification records, which included field observation of randomly selected individuals performing covered tasks. SED found no unsatisfactory items or concerns with the Ventura Compressor Station during the compliance audits. The results of the compliance audits did not identify any operational risks.

The Project consists of the gas suction and discharge tie-ins (one each, respectively) off the existing compressor station transmission pipelines, terminated at the first block valves on each of the new gas suction and discharge pipelines. The Project would be subject to the same rigorous compliance requirements as the current Ventura Compressor Station, including inspection, testing, maintenance, and regulatory oversight.

CPUC Comment #3: Provide details on the frequency and consequences for potential hazards to the public in the baseline conditions and conditions at the site with the proposed project for consideration of potential loss of containment and hazard scenarios.

Response to CPUC Comment #3: SoCalGas is in the process of contracting with an independent consultant to prepare a Quantitative Risk Assessment Study. The proposed completion date will be determined and provided to the CPUC. An analysis of both the existing station and the proposed facility will be conducted.

CPUC Comment #4: Please identify the types of upset incident scenarios that would be addressed by the HASP.

Response to CPUC Comment #4: Appendix O, Preliminary Emergency Action and Fire Prevention Plan and Preliminary Health and Safety Plan, was updated to address this comment. The updated Appendix O is attached.

CPUC Comment #5: Please identify when shelter-in-place or evacuation would be considered for onsite staff and offsite receptors.

Response to CPUC Comment #5: Appendix O, Preliminary Emergency Action and Fire Prevention Plan and Preliminary Health and Safety Plan, was updated to address this comment. The updated Appendix O is attached.

CPUC Comment #6: Please provide details on the timing and possible scopes of future process hazard analyses, including Hazard and Operability (HAZOP) and Layer of Protection Analysis (LOPA) studies, to be completed during the design and construction phases (PEA pg. 5.9-19).

Response to CPUC Comment #6: The details on the timing and future process hazard analyses to be completed during the design and construction phases were added within Section 5.9.4, Impact Analysis, in Section 5.9, Hazards, Hazardous Materials, and Public Safety under Threshold 5.9b as follows:

Operation

Less-Than-Significant Impact. As discussed in Section 5.9a), natural gas is flammable; therefore, there are safety systems in place to minimize the potential for upset or accident conditions involving the release of natural gas. As noted by the Pipeline and Hazardous Materials Safety Administration (DOT 2018), trillions of

cubic feet of natural gas are safely delivered throughout the United States each year. As described in Section 5.9a), an ESD system would continue to be used at the compressor station under the Project. NFPA Code 85A requires both the use of double-block and bleed valves for gas shutoff and automated combustion controls. These measures significantly reduce the likelihood of an explosion in gas-fired equipment. Additionally, startup procedures require air purging of the natural gas engines prior to startup, thereby precluding the presence of an explosive mixture. The safety management practices (SMPs) employed by SoCalGas address the handling and use of natural gas, and significantly reduce the potential for an incident such as a fire or explosion because of either improper maintenance or human error. Compliance with existing regulations and standards ensures minimal risks of pipeline failure off site or on site.

The Project would be designed and constructed in accordance with applicable laws, codes, industry standards, and SoCalGas project requirements. The facility would be designed to incorporate best available technology and safeguards for the protection of the general public, environment, personnel working in and around the Project and existing facilities, and equipment. Examples include, but are not limited to, the following: (1) the facility would be designed to require relief devices or other operating pressure controls on all natural gas systems for overpressure protection; (2) aboveground spill containment would be provided for all process and utility equipment with liquid inventory and potential for leakage and spills; (3) instrumentation and control systems would be connected to a Supervisory Control and Data Acquisition (SCADA) network for remote monitoring of control devices and alarms to promptly alert personnel to any potential hazards; (4) the compressor building would be designed with specific emergency shutdown and safety systems; and (5) fire and gas detection with audible and visual alarms would be provided throughout the compressor building, power distribution center, and office and warehouse buildings. The compressor building, warehouse, and office buildings would be designed to include an automatic wet fire sprinkler system connected to a fire loop system that would encircle the Project. During the design and construction phase, SoCalGas would perform design and safety reviews, including Hazard and Operability (HAZOP) to identify, evaluate, and control hazards and risks. To identify, address, and mitigate potential hazards of the proposed project, various process hazard analyses (PHAs) will be performed at different design phases of the project. PHAs follow the generally accepted practices of OSHA but have been modified to be applicable to the natural gas industry. The planned PHAs are shown in Table 5.9-2.

Table 5.9-2. Planned Process Hazard Analyses

Process Hazard Analyses Type	Design Phase Timing	Scope Description
HAZID	Early design phase (10% engineering)	Hazard analysis is conducted at the early design phase of the Project to identify potential hazards and the consequential effects on the facility. Documentation needed for review includes process flow diagrams (PFDs), heat and material balance (H&MB), plot plan.
HAZOP (FEED Design)	Front-End Engineering Design (FEED) PHA at 30% design phase	Systematic hazard analysis on the main gas process and utility systems. Details within the engineered skid package equipment (e.g., gas compressors along with the vendor provided instrumentation, supporting utility systems, control logic) are typically not yet available at this stage and

Table 5.9-2. Planned Process Hazard Analyses

Process Hazard Analyses Type	Design Phase Timing	Scope Description
		will be analyzed at the next engineering design phase. Documentation needed for review includes piping and instrumentation diagrams (P&IDs) (30% design phase), preliminary control narrative, preliminary cause and effect matrix, plot plan.
HAZOP (Detailed Design)*	Detailed Design PHA at 60%–90% design phase	Systematic hazard analysis addressing main process and utility systems, along with new information within vendor scope boundaries for engineered skid package equipment that are available at this stage. Documentation needed for review include P&IDs (at least 60% design phase), control narrative, cause and effect matrix, plot plan
Pre-Start Up Safety Review (PSSR)	Post IFC (Issued for Construction)	A thorough field safety walk-down to verify new installation and confirm start-up requirements have been met. Documentation needed include PSSR site checklist, plot plan, engineering design data sheet, P&IDs, and vendor documentation.

Note:

* It is possible that there could be additional HAZOPs in the Detailed Engineering Design phase to address minor design changes or to accommodate the timing of receipt of vendor data.

2.2 Deficiency Area No. 2, Water Use

CPUC Comment #7: Please quantify the volumes of water that could be used for hydrotesting and dust control, as mentioned in PEA Section 3.5.8, and incorporate this project effect in the impact analysis.

Response to CPUC Comment #7: Section 3.5.8, Water Use and Dewatering, in Chapter 3, Project Description, and Section 5.10.4, Impact Analysis, in Section 5.10, Hydrology and Water Quality, of the PEA were updated as follows:

3.5.8 Water Use and Dewatering

Construction water for hydrotesting and dust control would be provided by municipal water provided by a Project-specific meter off the existing City water supply to the Project Site. Where possible, water that has been utilized for hydrostatic testing of piping (and then tested per applicable environmental requirements) would be utilized on site for dust control. Hydrostatic test water would be treated as municipal potable water or disinfected tertiary recycled water (Title 22) and used whenever possible. Table 3-9 below summarizes the estimated water volume usage throughout construction.

Based on prior studies on the Project Site, SoCalGas does not anticipate needing to dewater groundwater during excavation.

Table 3-9. Preliminary Estimates for Construction Water Usage

Hydrostatic Testing*	50,000 gallons
Dust Control Average Daily	10,000 gallons
Dust Control (Phases 1-8)	5,860,000 gallons

Note:

* Hydrostatic test water will be recycled for dust control consistent with the Statewide General Order for Discharges from Natural Gas Utility Construction, Operations and Maintenance Activities (Order WQ 2017-0029-DWQ) or other applicable permit or removed for disposal at a SoCalGas-approved facility.

5.10.4 Impact Analysis

5.10b) 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?

No Impact. The City of Ventura is the water purveyor for the Project Site. Approximately 65% of the City's total supply are derived from the Mound, Oxnard Plain, and Santa Paula groundwater basins of Ventura County. The Mound and Oxnard Plain groundwater basins are designated a high-priority basin with respect to SGMA. The Final Draft Mound Basin GSP was submitted to DWR in October 2021, but has not been formally adopted by DWR. The Final GSP for the Oxnard Subbasin was adopted by DWR on November 18, 2021. The Santa Paula Groundwater Basin is adjudicated and exempt from the GSA process. ~~However, water demand for the Project would be the same as under existing conditions.~~

As described in Section 3.5.8, Water Use and Dewatering, the water demand for dust control during construction would be approximately 5,860,000 gallons, which would be spread out over 26 months during Project construction Phases 1 through 8. During Project operations, the water demand for periodic hydrostatic testing would be approximately 50,000 gallons per day, which would be similar to existing conditions. Hydrostatic test water will be recycled for dust control consistent with the Statewide General Order for Discharges from Natural Gas Utility Construction, Operations and Maintenance Activities (Order WQ 2017-0029-DWQ) or other applicable permit or removed for disposal at a SoCalGas-approved facility. As a result, the water demand during operations would not change with respect to existing water use. With no significant increase in water demand, the Project would not decrease groundwater supplies, in comparison to existing conditions; as a result, it would not impede sustainable groundwater management of the Mound, Oxnard, and Santa Paula Groundwater Basins.

Currently, areas between existing structures and equipment on the Project Site are either paved with asphalt or covered with compacted gravel, and the off-site Staging Area is paved. Following Project construction, areas between structures and equipment would similarly be covered with compacted gravel or asphalt and there would be negligible opportunities for infiltration in the Development Area in the existing condition and the proposed condition. The discharge of the collected stormwater to the local stormwater system would be controlled through the stormwater detention system, and only discharge within the allowable limits of the agreed upon permit. Because pre-development and post-development Development Area conditions are pavement and compacted gravel, the post-development stormwater discharge rate would not exceed the pre-development discharge rate. Therefore, the potential for stormwater infiltration in the Development Area would not be substantively altered by implementation of the Project. As a result, the Project would not interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the Lower Ventura River Basin; therefore, no impact would occur.

2.3 Deficiency Area No.3, Description of Alternatives

CPUC Comment #8: Clarify whether the existing natural gas compressors would be retained under this alternative, and address whether new natural gas compressors would be installed. Please also provide a conceptual site plan showing the components of this alternative.

Response to CPUC Comment #8: Section 4.3.1, Supplemental Electric-Driven Compressor Installation Only Alternative, in Chapter 4, Description of Alternatives, was revised as follows:

4.3.1 Supplemental Electric-Driven Compressor Installation Only Alternative

~~The Project includes the replacement of the existing natural gas driven compressors (natural gas compressors) with two new natural gas compressors and two new electric driven compressors (electric compressors).~~ This alternative would leave the three existing natural gas compressors and install new electric compressors at the site. The operation of the compressor station would primarily utilize the electric compressors first and use the existing natural gas compressors only as needed. No removal of the existing equipment and buildings related to the natural gas compressors would occur. Construction of a new building to house the new electric compressors and the associated improvements and infrastructure necessary would be completed as part of this alternative. Please reference Figure 4-2, Supplemental Electric-Driven Compressor Alternative Site Plan, and Appendix A, Detailed Maps and Design Drawings, for a conceptual site plan that includes a preliminary equipment listing for this alternative alongside the existing facility.

2.4 Deficiency Area No. 4, Traffic Impact Analysis

CPUC Comment #9: Provide a traffic impact study, prepared in accordance with guidance from the City of Ventura, where appropriate.

Response to CPUC Comment #9: Due to the small increase of one permanent employee at the site, the traffic impact study focuses on construction rather than operation. As such, Appendix R, Preliminary Traffic Plan and Control, was prepared to provide an example of a traffic control plan that would be implemented during Project construction. Appendix R is attached to this document.

2.5 Deficiency Area No. 5, Geospatial Information

CPUC Comment #10: Provide GIS data layers including labels or a site plan legend with an index and description of the various elements from the drawing. The labels or tabulated index should briefly describe the features identified in the detailed site plan of PEA Appendix A.

Response to CPUC Comment #10: Appendix A, Maps and Drawings, was updated to include the requested information.

CPUC Comment #11: Provide GIS data or Google-earth format drawings for each of the "Alternatives Considered Further" (PEA Section 4.3). This data should include the alternative sites themselves, the areas required for permanent ground disturbance and temporary disturbance during construction, and the new off-site infrastructure such as road improvements, new pipeline, and electrical utility extensions (described in PEA Section 4.3; depicted on PEA Figure 4-1).

Response to CPUC Comment #11: Appendix A, Maps and Drawings, was updated to include the requested information.

2.6 Additional Information for Completeness

CPUC Comment #12: Aesthetics, Section 5.1.1.7. In PEA Section 5.1.1.6, photos of existing conditions appear to be taken on January 27, 2023 (PEA pg. 5.1-9). However, Table 5.1-1 in PEA Section 5.1.1.7 (PEA pg. 5.1-11) says that they were taken on July 11, 2023. Please confirm the dates of representative photos.

Response to CPUC Comment #12: Section 5.1.1.6, Representative Viewpoints of Aesthetics, in Section 5.1, Aesthetics, was revised as follows:

5.1.1.6 Representative Viewpoints

Figures of existing and Project Site conditions were prepared using representative vantage points (key observation points [KOPs]) from publicly accessible locations in the Project area. The locations of the KOPs and relative directions of the provided viewpoints are provided in Figure 5.1-2, Key Observation Points. The KOPs represent a range of views of the Project Site from major roads, highways, trails, parks, and vistas within view of the Project Site. The existing conditions photographs from the identified KOPs were taken during ~~a~~ site visits on January 27, 2023, and July 11, 2023, when viewing conditions were clear, as provided in Figures 5.1-3A through 5.1-3E.

CPUC Comment #13: Biological Resources, Section 5.4.1.5. The PEA Checklist Section 5.4.1.5.f (on special-status species) requires identifying the potential to occur within the survey area (i.e., Present, High Potential, Moderate Potential, Low Potential, or Not Expected), with justification based on the results of the records search, survey findings, and presence of potentially suitable habitat. Terms for level of potential were included for one plant (i.e., "medium potential" for white rabbit-tobacco) but were missing for two other plants. Please provide the level of potential for Ventura marsh milk-vetch and Coulter's goldfields.

Response to CPUC Comment #13: Appendix C, Biological Resources Assessment, was updated to address this comment. The updated Appendix C is attached to this document. In addition, Section 5.4.1.5, Habitat Assessment, in Section 5.4, Biological Resources, was revised as follows:

5.4.1.5 Habitat Assessment

Special-Status Plants

The developed/disturbed portions of the Study Area, including the entire 11-acre Development Area, lack habitat for special-status plants; as a result, none are expected to occur in this land cover type. According to the literature review presented in Appendix B of the attached Biological Resources Assessment (Appendix C to this PEA), 30 special-status plants are known to occur in the region. No special-status plants were observed within the Development Area during the field visit and each special-status plant known within the region was assessed as having no potential to occur in the developed/disturbed areas due to a lack of native habitats and the developed nature of this land cover type. No special-status plant species have been previously recorded in the California Natural Diversity Database (CNDDB) within the developed/disturbed areas and the Development Area is not within designated or proposed Critical Habitat for any plant species (CDFW 2023a; USFWS 2023a). No special-status species have the potential to occur in the developed/disturbed areas of the Project Site because the areas are entirely developed with bare, compacted soils that are graded, and special-status plants occur in native plant communities and habitats, which are absent from the Development Area. Only sparse non-native vegetation, occasional ornamental trees, and invasive vegetation occur within the Project Site. The developed/disturbed portions of the Study Area do not support special-status plants and the existing development precludes special-status plants from establishing there in the future.

The arroyo willow thickets within the Ventura River corridor, which occur approximately 700 feet[5] away from and entirely outside the Development Area, have the potential to support the following special-status plants:

- Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*) is a federal and state endangered plant that is recorded in the CNDDB within Ventura River corridor near the Development Area. There is one record of this species from 1987 that does not have an accurate location information and is possibly extirpated. Nonetheless, the species ~~could~~ has a low potential to occur in the Ventura River corridor due to the suitable habitat and past records of the species in the vicinity of the Study Area.
- Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*) has a California Rare Plant Rank (CRPR) of 1B.1, indicating that it is rare throughout its range. There is a single occurrence of this plant recorded in the CNDDB within the Ventura River corridor near the Development Area. The exact location of the recorded occurrence is not known and is listed in the CNDDB as in Ventura or the Ventura River. Based on the

[5] The arroyo willow thickets occur approximately 50 west of the outer edge of the Ventura River corridor, which is approximately 650 west of the Staging Area.

suitable habitat within the Ventura River corridor and the past occurrence records of the species, it has ~~the~~ a high potential to occur in the Ventura River corridor in the Study Area.

- White rabbit-tobacco (*Pseudognaphalium leucocephalum*) has a CRPR of 2B.2, indicating it is common outside California but rare in California. This species has a medium potential to occur in the Ventura River corridor based on suitable habitat and known occurrence records in the region. This species has CNDDB records within the Santa Clara River corridor, approximately 7 miles from the Project Site. Nonetheless, there is suitable habitat for the species in the Ventura River corridor and there is a medium potential for this species to occur.

CPUC Comment #14: Greenhouse Gas Emissions Setting, Section 5.8.1.1. The PEA Checklist Section 5.8.1.1 requires consideration of GHG emissions from existing infrastructure, and PEA Section 5.8.1 (PEA pg. 5.8-1) identifies reported volumes of natural gas due to compressor-vented emissions and fugitive leaks from components. Please convert the volumes of natural gas to quantify the GHG emissions in terms of mass (metric tons of CO_2-equivalent) for each baseline year for the vented and fugitive leak emissions.

Response to CPUC Comment #14: Section 5.8.1, Environmental Setting, in Section 5.8, Greenhouse Gas Emissions, has been revised as follows to address the comment:

5.8.1 Environmental Setting

The 8.42-acre Project Site is located at 1555 North Olive Street (Assessor's Parcel Number 068-0-142-030) in the City of Ventura, slightly west of State Route 33. The approximately 2.53-acre temporary construction staging area (Staging Area) is adjacent to the west of the Project Site. Where combined, the Project Site and the Staging Area are referred to as the Development Area.

GHG emissions from existing infrastructure that will be replaced by the Project includes three existing natural gas compressors and emergency generator. The replacement infrastructure includes two new natural gas compressors, two electric compressors, and a standby generator. Additional worker commuting vehicles and additional grid electricity usage is expected as a result of the Project.

Existing compressor leaks are summarized in the California Air Resources Board (CARB) Oil and Gas reports from 2021–2022. Based on CARB's Oil and Gas reports, Ventura Compressor Station recorded 24 leaks from components in fugitive service in 2021 and 17 in 2022. The existing compressor-vented emissions and emissions associated with leaks from components in fugitive service are summarized in Senate Bill (SB) 1371 reports that are submitted to the California Public Utilities Commission (CPUC) and CARB annually. The natural gas volumes SoCalGas reported in response to the requirements of SB 1371 were 398 thousand standard cubic feet (Mscf) in 2021 and 803 Mscf in 2022. ~~For baseline years 2021 and 2022, 398 thousand standard cubic feet (Mscf) and 803 Mscf of emissions were reported, respectively, for Ventura Compressor Station.~~ In 2021, 88% was associated with compressor-vented emissions and 12% was associated with fugitive components. In 2022, 91% was associated with compressor-vented emissions and 9% was associated with fugitive components. In response to the CPUC request for additional information, the greenhouse gas emissions estimated to be associated with these volumetric reported values were calculated in metric tons of CO_2-equivalent (MT CO_2e). For baseline years 2021 and 2022, the calculated values are 180 MT CO_2e and 361 MT CO_2e, respectively.

The Ventura Compressor Station's on-site natural gas is limited to the volume stored in the on-site pipelines. In the event of an abnormal condition resulting in the accidental release of natural gas, the volume of natural gas released would be limited to the volume stored in the pipelines at that time.

CPUC Comment #15: Hydrology and Water Quality, Section 5.10.2.1, Regulatory Setting. The PEA Checklist requires identification of applicable standards regarding hydrologic and water quality. Please reference the latest permit for municipal separate storm sewer systems (MS4) that covers the proposed project area, Order R4-2021-0105 (Regional Permit), July 23, 2021, and update total maximum daily loads (TMDLs) listed in new MS4 for Ventura River for the regional regulatory setting (PEA Section 5.10.2.3).

Response to CPUC Comment #15: The Section 5.10.1.2, Water Quality, and Section 5.10.2.3, Regional, in Section 5.10, Hydrology and Water Quality, of the PEA has been revised as follows to address the comment:

5.10.1.2 Water Quality

The Development Area is east of Ventura River Reach 2, which extends approximately 4 miles from Main Street in the City of Ventura north to Weldon Canyon Road in the County of Ventura (LARWQCB 2020). The Ventura River is considered a water of the United States (EPA 2023~~a~~) and a water of the state (Caltrans 2023). Ventura River Reach 2 is considered by the U.S. Environmental Protection Agency (EPA) as a CWA Section 303(d) listed impaired water, with respect to aquatic life and swimming/boating. A CWA Section 303(d) listed impaired water is a waterbody that is impaired or threatened and needs a total maximum daily load (TMDL) restoration plan. A TMDL is the calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody will meet and continue to meet water quality standards for that pollutant. A TMDL determines a pollutant reduction target and allocates load reductions necessary to the sources of the pollutant. Once a waterbody is placed on the threatened and impaired water list, the waterbody will be evaluated and a TMDL restoration plan developed for applicable pollutants. Ventura River Reach 2 is impaired with algae, dissolved oxygen, eutrophication, flow alteration, nitrogen, nutrients, organic enrichment/low dissolved oxygen, pumping, trash, and water diversion. In 2013, SWRCB approved TMDLs for algae, nutrients, and eutrophic conditions for Reaches 1 and 2 of the Ventura River, which extends from the river estuary north to Weldon Canyon. <u>These TMDLs were updated in 2021.</u> EPA allowed a restoration schedule of 6 to 12 years, depending on the source of the contaminant. A plan for water quality restoration has not been completed to date (EPA 2022; <u>LARWQBC 2021;</u> SWRCB 2013).

5.10.2.3 Regional

Los Angeles Regional Water Quality Control Board Basin Plan

As mentioned above, the LARWQCB Basin Plan was written and implemented by the LARWQCB to preserve and enhance water quality throughout Ventura County. The Basin Plan outlines water quality parameters for both inland surface waters and for groundwaters for a wide variety of water quality constituents. Specifically, the Basin Plan (1) identifies beneficial uses for surface and ground waters, (2) includes the narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (3) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan.

Regional Phase I MS4 NPDES Permit

The LARWQCB regulates discharges from medium and large MS4s through the Regional Phase I MS4 Permit, which is a part of the NPDES Program. The City of Ventura is one of 10 incorporated cities within Ventura County that is a Permittee under the Regional Phase I MS4 Permit, Order No. R4-2021-0105, NPDES Permit No. CAS004004. As set forth in this order, the City is subject to waste discharge requirements for their MS4 discharges originating from within their jurisdictional boundaries, composed of stormwater and non-stormwater. Under the order, each Permittee is required to reduce pollutants in stormwater discharges from the MS4 to the maximum extent practicable, as well as in compliance with water quality based effluent limitations, pursuant to applicable compliance schedules. In 2013, the SWRCB approved TMDLs for algae, nutrients, and eutrophic conditions for Reaches 1 and 2 of the Ventura River, which extends from the river estuary north to Weldon Canyon. These same TMDLs were updated in 2021 as detailed in Attachment K, Ventura River Watershed TMDLS, of Order R4-2021-0105. EPA allowed a restoration schedule of 6 to 12 years, depending on the source of the contaminant.

CPUC Comment #16: Hydrology and Water Quality, Section 5.10.4.4, Impermeable Surfaces. The PEA Checklist requires identification of new impermeable surfaces. Please provide the acreage of total new impervious surfaces to support the impact analysis of PEA Section 5.10.4.

Response to CPUC Comment #16: Section 5.10.4, Impact Analysis, of Section 5.10, Hydrology and Water Quality, of the PEA has been revised as follows to address the comment:

5.10.4 Impact Analysis

5.10c) 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:

Operation

No Impact. The Project Site is currently paved with asphalt and compacted gravel. As indicated in the Hydrology Drainage Report (Appendix L), following Project construction, the Project Site would include approximately 3.1 acres of new impermeable surfaces, including concrete and asphalt paving. Overall Project Site disturbance would be greater than 50% of the Project Site; therefore, the Stormwater Quality Design Volume (i.e., required amount of stormwater detention) must consider disturbance of the entire Project Site. In compliance with the Ventura County Technical Guidance Manual, the amount of detained stormwater would be equal to the 85th percentile 24-hour runoff event, determined for the Project Site as the maximized capture stormwater volume using a 48- to 72-hour drawdown time. This approach yielded a detention volume of 46,000 cubic feet, with an additional volume of 20% recommended for sediment storage. For detained water to be discharged to the City stormwater sewer in a 24-hour period, a 240 gallon-per-minute discharge rate must be maintained. With construction of a detention basin in the southeast corner of the Project Site, as well as the compressed gravel on the Project Site in both pre-and post-development conditions, post-construction runoff rates would be less than or equal to existing runoff rates (Appendix L).

In addition, the Project Site is relatively flat and would remain relatively flat following construction. Cut and fill grading would be completed primarily for over-excavation and recompaction of unsuitable soils beneath proposed foundations. Drainage across the Project Site would not change substantially. Based on this fact,

in combination with the proposed construction of a stormwater capture and detention basin and compliance with existing regulations, the long-term operation of the Project would not have erosion or siltation impacts.

CPUC Comment #17: Transportation, Section 5.17.4.2, Vehicle Miles Traveled (VMT). The PEA Checklist requires detailed information regarding VMT generation for project construction. Please quantify VMT for construction and provide this information in terms of the fleet mix between light-duty and heavy-duty vehicles. Please also evaluate project VMT relative to the average VMT for the area.

Response to CPUC Comment #17: Attachment 5, VMT Calculation Spreadsheet, was provided to address this comment. Attachment 5 is attached to this document. In addition, Section 5.17.4, Impact Analysis, in Section 5.17, Transportation, was revised as follows:

5.17a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less-Than-Significant Impact. The Project would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system, as further discussed below. This includes the County Comprehensive Transportation Plan, the 2005 Ventura General Plan (City of Ventura 2005), the City's Bicycle Master Plan (City of Ventura 2011), and the existing and proposed pedestrian, bicycle, and transit facilities and services in the study area.

The Project would result in a temporary, short-term increase in traffic during construction. This includes construction workers arriving to and from the Development Area and the delivery of large construction equipment to the Development Area as needed. Construction activities would occur entirely on the Project Site, with no off-site roadway construction. Construction of the compressor station, including pad grading, buildings, and compressors, would take approximately ~~30~~ 31 months. The existing equipment would be decommissioned approximately 1 year after the replacement equipment is fully operational. Following decommission the plant would be demolished; this process would take approximately 3 months. Heavy earthwork is assumed to occur for approximately 3 months as part of the initial construction activities. Because the site is already developed, no major import/export of soils or materials via dump trucks and oversized vehicles is anticipated. As detailed in Table 3-7, Construction Crew Vehicle Types, in Chapter 3, Project Description, the Project is estimated to generate worker/vendor vehicle trips over the course of the Project construction activities. Table 5.17-3 details the total number of daily one-way trips per phase and the daily and total VMT for each construction phase. The detailed spreadsheet containing these calculations is included as Attachment 5.

Table 5.17-3. Daily One-Way Trips by Phase for Vendor/Worker Vehicles and Total VMT

Phase No.[a]	Work Description	No. of Daily One-Way Trips	Total Daily Phase VMT	Total VMT per Phase
1	Subsurface Exploration	~~49~~41	570	26,220
2	Existing Project Site Demolition	82~~78~~	1,340	14,740
3	Site Preparation/Rough Grading	92~~48~~	2,584	43,928
4	Foundations	94~~109~~	1,260	210,420
5	Trenching/Undergrounds	57~~64~~	858	48,906

Table 5.17-3. Daily One-Way Trips by Phase for Vendor/Worker Vehicles and Total VMT

Phase No.~~a~~	Work Description	No. of Daily One-Way Trips	Total Daily Phase VMT	Total VMT per Phase
6	Equipment, Structural Steel and Building Erection, and Piping	101~~0~~	1,296	274,752
7	Electrical and Instrumentation	5~~3~~2	562	124,202
8	Paving	34~~22~~	724	29,684
9	Painting/Insulation	13~~4~~	418	17,138
10	Commissioning/Startup and Testing	4~~3~~0	526	58,386
11	Site Restoration	14	588	12,348
12	Decommissioning Demolition	49	520	34,320

~~Note:~~

~~a No offroad equipment is expected to be used for Phase 11, Site Restoration, so this phase is not included.~~

Once construction is complete, Project operations and maintenance would require one new permanent employee on the Project Site, for a total of four operational employees on site in shifts from 6:00 a.m. to 3:00 p.m., which are outside peak hours. During project operations, all activities would be limited to the Project Site. Given the minimal number of additional employees, there would be no significant increase in traffic over baseline conditions.

Access to the site is provided from U.S. Route 101 and SR-33 to Stanley Avenue and Olive Street. Construction traffic is not anticipated to travel on any other local roads. As described in Section 3.5.1.2 of the Project Description chapter of this PEA, temporary construction access would be provided across the T&T Crane property to the west, connecting to Stanley Avenue, which would reduce construction traffic on Olive Street and any other local roads. As needed, large construction equipment (e.g., compressors) may need to be transported to Olive Street; however, the majority of construction traffic would access the Project Site via Stanley Avenue. Travel lanes on Olive Street may be temporarily blocked during the delivery of large construction equipment. No full road closures are anticipated, and major shipments and delivery of oversized loads would occur during non-peak traffic hours only. SoCalGas would implement measures as described in Project Best Management Practice (BMP) TRA-1 and BMP-TRA-2 (refer to Section 5.17.7.2 for full text of these BMPs) to minimize potential impacts during construction, including the use of flaggers during the delivery of large equipment and restoration of Project access roads to pre-Project conditions.

Bike lanes are currently located on Stanley Avenue and Olive Street near the Project Site, and the Gold Coast Transit District provides transit service on both streets. However, the Project would not alter the existing roadway network or hinder the City's ability to provide residents with more transportation choices in the future. Truck traffic would not impact residential neighborhoods and there would be no changes that would affect the safety and accessibility of the transportation system. The Project would not include site improvements that would extend into the public right-of-way or interfere with existing public transit, bicycle, or pedestrian facilities, or impede the construction of new or the expansion of existing facilities in the future. Therefore, the Project would not adversely affect or conflict with an applicable program, plan, ordinance, or policy addressing the performance of the circulation system, including public transit, roadway, bicycle, or pedestrian facilities. Impacts would be less than significant.

5.17b) Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Construction

Less-Than-Significant Impact. The anticipated maximum daily vehicle trips for each of the Project's phases are listed in Table 5.17-3. Construction of the Project would not add more than 110 daily trips to the roadways per phase and would result in a total VMT of 895,044 miles for all phases over the 31-month construction period. ~~In addition, these trips would be temporary.~~ The Project would generate an annual VMT of approximately 346,469 miles. The City of Ventura has a total City Baseline VMT of 4,432,696 (VCTC 2023b), and during construction, the Project's annual percent of the city-wide VMT is anticipated to be approximately 7.2%. However, these trips would be temporary and only last through Project construction.

Once construction is completed, construction-related traffic would cease, and traffic would return to pre-construction conditions. According to the OPR Technical Advisory (OPR 2018), there are no thresholds or significance criteria for temporary construction-related VMT because construction projects do not typically result in permanent increases in VMT. Project construction would be consistent with typical construction activities in terms of the temporary nature of activities, trip generation characteristics, and the types of vehicles and equipment required.

As shown in Table 5.17-3, the Project will generate fewer than 110 vehicle trips per day during construction. Per the OPR Tech Advisory, lead agencies may screen out VMT impacts by using project size, maps, and transit availability. The OPR Technical Advisory states that absent substantial evidence to the contrary, it is reasonable to conclude that the addition of 110 or fewer (permanent) daily trips could be considered not to lead to a significant VMT impact (OPR 2018). Although this screening criteria is related to an increase in permanent daily trips, the Project's temporary construction traffic would also fall below this significance threshold. Therefore, based on the above, the increase in VMT associated with the Project's construction traffic would be minimal (less than 110 daily trips) and temporary and would therefore not cause a significant VMT impact. Impacts would be less than significant.

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3 Additional Revisions to the PEA

3.1 Reason for Revisions

The August 2023 version of the PEA assumed construction activities for the Project would commence in May 2029 and would last approximately 30 months. The PEA has been revised to reflect a construction start date of October 1, 2029, with construction lasting approximately 31 months. This is a global change that is reflected throughout the PEA. No change in level of significance determinations or mitigation requirements would occur as a part of this update.

In addition, SoCalGas completed a detailed review of the construction assumptions and inputs used in the air quality, greenhouse gas, and energy analysis. During this review, it was discovered that the version of CalEEMod available for the previous analysis contained an error and did not account for the emissions from certain pieces of construction equipment, and therefore, those emissions were not considered in the previously provided analysis. As such, SoCalGas opted to rerun the modeling with the updated CalEEMod Version 2022.1.1.19. As part of this remodel, equipment numbers per day were adjusted, where appropriate, to account for instances of equipment that had previously been double counted during periods of phase schedule overlap. This adjustment also considers space constraints for equipment use and elimination of redundant equipment, as appropriate. CalEEMod daily default hours were used, and for equipment where no default hours where available, a conservative value of 8 hours per day was used. No change in level of significance determinations or mitigation requirements would occur as a part of this update.

Appendix B, Air Quality and GHG Emissions Technical Report, has been updated to reflect these changes and is attached to this document.

3.2 Revision Text Changes

Revisions to the PEA are shown below as excerpts from the PEA text. Added or modified text is in <u>double-underline</u> format, while deleted text is shown as strikeout text ~~(example)~~.

3 Project Description

3.5.11 Fire Prevention and Response

The station, including its piping, safety, and fire equipment, is equipped with continuous remote/on-site monitoring equipment, and is also subject to in-person testing and inspection, as further described below. SoCalGas also is in regular communication with first responders, including the Ventura City Fire Department (VCFD), which is the primary emergency response agency for an emergency natural-gas-related incident at the Ventura Compressor Station. VCFD also reviews and approves the facility's HMBP and SPCC. In advance of routine maintenance activities, SoCalGas contacts VCFD to maintain open communication. Additionally, SoCalGas's Emergency Services Department conducts annual briefings with first responders in Ventura and across its service territory so that they are educated about how to respond to a natural gas incident. Flammable materials and liquids would be stored in dedicated containers or staged in dedicated areas away from hot work. Additionally, the facility would comply with all OSHA and Cal/OSHA requirements.

Given the location of the facility, no fire breaks or vegetation clearing is anticipated. Emergency access is related to roadway access for first responders, such as the fire department. The Ventura County Fire Department Standard 501, Fire Apparatus Access Standard, requires that emergency access roads be a minimum of 24 feet wide and not exceed a slope of 20%, with turnouts every 150 feet (Ventura County Fire Department 2022). The site has access points that connect to North Olive Street. The primary entrance (and main access point) is 36 feet wide. A secondary access point is 20 feet wide. The primary entrance is sufficient for fire trucks and other emergency response vehicles that connect to North Olive Street. The existing facility also has fire water infrastructure on site that meets fire department requirements.

The draft version of the emergency action and fire prevention plan is provided in Appendix ~~H~~O. This plan describes the fire prevention and response procedures that would be implemented during Project operation.

3.6 Construction Workforce, Equipment, and Traffic

Estimated numbers and types of construction workers are provided in Table 3-5.

Table 3-5. Construction Workforce Specifications

Phase	Phase Work Description	Estimated Duration (Weeks)[a]	FTE Average	FTE Peak
1	Subsurface Exploration	9	12	18
2	Existing Project Site/ Paving Demolition	2	10	15
3	Site Preparation/Rough Grading (including setup of Construction Facilities)	3	13	20
4	Foundations	33	30	45
5	Trenching/Undergrounds	11	20	30
6	Equipment, Structural Steel and Building Erection, and Piping	42	35	53
7	Electrical and Instrumentation	44	16	24
8	Paving	8	10	15
9	Painting/Insulation	8	2	3
10	Pre-Commissioning/ Commissioning/ Startup and Testing	~~30~~22	12	18
11	Post-Construction/ Site Restoration	4	12	18
12	Decommissioning	~~12~~13	15	20

Notes: FTE = full-time equivalent.
[a] Assumes a schedule of 10 hours per day, 5 days per week.

Off-road construction equipment that will be required for the Project is provided in Table 3-6.

Table 3-6. Project Off-Road Construction Equipment

Phase No.	Name	Equipment Type	HP[a]	No. per Day	Fuel Type[b]	Hours Per Day[c]
1	Subsurface Exploration (Site Preparation)	Tractors/loaders/ backhoes	107	1	Diesel	[8]~~9~~
		Excavators	45	1	Diesel	[8]~~9~~
		Air compressors	2	1	Diesel	[6]~~9~~
		Off-highway trucks	500	1	Diesel	~~8~~9
		Tractors/loaders/ backhoes	321	1	Diesel	[8]~~9~~
		Bore/drill rigs	300	1	Diesel	~~8~~9
2	Existing Project Site Demolition (Demolition A)	Concrete/industrial saws	33	1	Diesel	[8]~~9~~
		Tractors/loaders/ backhoes	107	1	Diesel	[8]~~9~~
		Excavators	45	1	Diesel	[8]~~9~~
		Air compressors	2	1	Diesel	[6]~~9~~
		Off-highway trucks	500	1	Diesel	~~8~~9
		Tractors/loaders/ backhoes	321	1	Diesel	[8]~~9~~
		Skid steer loaders	65	1	Diesel	~~8~~9
3	Site Preparation/ Rough Grading (Grading)	Excavators	45	1	Diesel	[8]~~9~~
		Tractors/loaders/ backhoes	107	1	Diesel	[8]~~9~~
		Air compressors	2	1	Diesel	[6]~~9~~
		Off-highway trucks	500	1	Diesel	~~8~~9
4	Foundations (Building Construction 1)	Air compressors	10	1	Diesel	[6]~~9~~
		Cranes	275	1	Diesel	[7]~~9~~
		Excavators	45	1	Diesel	[8]~~9~~
		Excavators	346	1	Diesel	[8]~~9~~
		Forklifts	74	1	Diesel	[8]~~9~~
		Forklifts	[82]	1	Electric	[8]~~9~~
		Generator sets	49	~~3~~4	Diesel	[8]~~9~~
		Off-highway trucks	500	1	Diesel	~~8~~9
		Rubber-tired dozers	170	1	Diesel	[8]~~9~~
		Tractors/loaders/ backhoes	225	1	Diesel	[7]~~9~~
		Tractors/loaders/ backhoes	321	1	Diesel	[7]~~9~~
		Tractors/loaders/ backhoes	107	~~2~~1	Diesel	[7]~~9~~
		Welders	24	~~4~~2	Diesel	[8]~~9~~
		~~Pumps~~	~~[11]~~	~~4~~	~~Electric~~	~~9~~
5	Trenching/ Undergrounds (Trenching)	Pumps	[11]	4	Electric	[8]
		Excavators	45	1	Diesel	[8]~~9~~
6	Equipment, Structural Steel & Building Erection, Piping (Building Construction 2)	~~Aerial lifts~~	~~84~~	~~1~~	~~Diesel~~	~~9~~
		Aerial lifts	67	~~2~~1	Diesel	~~8~~9
		Aerial lifts	[46]	5	Electric	~~8~~9
		Air compressors	49	1	Diesel	[6]~~9~~
		Air compressors	10	2	Diesel	[6]~~9~~
		Cranes	200	1	Diesel	[7]~~9~~
		Cranes	275	2	Diesel	[7]~~9~~
		Excavators	45	1	Diesel	[8]~~9~~

Table 3-6. Project Off-Road Construction Equipment

		Forklifts	[82]	1	Electric	[8]~~9~~
		Forklifts	122	1	Diesel	[8]~~9~~
		Forklifts	74	~~2~~1	Diesel	[8]~~9~~
		Generator sets	49	~~5~~3	Diesel	[8]~~9~~
		Off-highway trucks	500	1	Diesel	~~8~~9
		Tractors/loaders/ backhoes	225	2	Diesel	[7]~~9~~
		Welders	24	~~3~~2	Diesel	[8]~~9~~
		Welders	[46]	5	Electric	[8]~~9~~
7	Electrical & Instrumentation (Building Construction 3)	Aerial lifts	[46]	4	Electric	~~8~~9
		Air compressors	49	1	Diesel	[6]~~9~~
		Air compressors	10	2	Diesel	[6]~~9~~
		Cranes	200	1	Diesel	[7]~~9~~
		Cranes	275	2	Diesel	[7]~~9~~
		Forklifts	[82]	1	Electric	[8]~~9~~
		Forklifts	74	~~2~~1	Diesel	[8]~~9~~
		Generator sets	49	~~5~~3	Diesel	[8]~~9~~
		Off-highway trucks	500	1	Diesel	~~8~~9
		Tractors/loaders/ backhoes	225	2	Diesel	[7]~~9~~
		Welders	[46]	5	Electric	[8]~~9~~
		Welders	24	~~5~~2	Diesel	[8]~~9~~
8	Paving (Paving)	Rollers	125	1	Diesel	[8]~~9~~
9	Painting/ Insulation (Architectural Coating)	Air compressors	10	1	Diesel	[6]~~9~~
		Generator sets	49	1	Diesel	[8]~~9~~
10	Commissioning / Startup and Testing (Building Construction 4)	Aerial lifts	[46]	4	Electric	~~8~~9
		Air compressors	49	1	Diesel	[6]~~9~~
		Cranes	275	1	Diesel	[7]~~9~~
		Forklifts	74	1	Diesel	[8]~~9~~
		Forklifts	[82]	1	Electric	[8]~~9~~
		Generator sets	49	3	Diesel	[8]~~9~~
		Tractors/loaders/ backhoes	225	2	Diesel	[7]~~9~~
		Welders	[46]	2	Electric	[8]~~9~~
		Welders	24	3	Diesel	[8]~~9~~
12	Decommissioning Demolition (Demolition B)	Concrete/industrial saws	33	1	Diesel	[8]~~9~~
		Excavators	45	1	Diesel	[8]~~9~~
		Aerial lifts	[46]	4	Electric	~~8~~9
		Air compressors	49	1	Diesel	[6]~~9~~
		Cranes	275	1	Diesel	[7]~~9~~
		Forklifts	74	1	Diesel	[8]~~9~~
		Forklifts	[82]	1	Electric	[8]~~9~~
		Generator sets	49	3	Diesel	[8]~~9~~
		Tractors/loaders/ backhoes	225	2	Diesel	[8]~~9~~
		Welders	[46]	~~2~~3	Electric	[8]~~9~~
		Welders	24	~~3~~2	Diesel	[8]~~9~~

Notes:

[a] Engine horsepower ratings for electric equipment in brackets are CalEEMod default values (Version 2022.1.1.19).

[b] All diesel engines are assumed to be EPA Tier 4 Final, and electric engines have an average electric mix of grid and local power supply.

[c] Construction "Hours per Day" are CalEEMod default values. A value of 8 hours per day is used for equipment for which there are no CalEEMod defaults (i.e., Bore/drill rigs, off-highway trucks, skid steer loaders, and aerial lifts).~~is expected to occur for up to 10 hours per day, with equipment use up to 9 hours per day.~~

3.6.1 Construction Traffic

Construction crews would be required to park at the Staging Area immediately to the west of the Project Site. Equipment would access the site through the Staging Area or through the Project Site entrance on North Olive Street. Crew vehicle types are provided in Table 3-7.

Table 3-7. Construction Crew Vehicle Types

Phase No.	Work Description	Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix[a]
1	Subsurface Exploration	Worker	28	10	LDA, LDT1, LDT2
	Subsurface Exploration	Vendor	8	10	HHDT, MHDT
	Subsurface Exploration[c][b]	Hauling	~~135~~	42 ~~(296)~~	HHDT
2	Existing Project Site Demolition	Worker	22	10	LDA, LDT1, LDT2
	Existing Project Site Demolition	Vendor	8	10	HHDT, MHDT
	Existing Project Site Demolition[d][c]	Hauling	~~48~~52	20	HHDT
3	Site Preparation/Rough Grading	Worker	30	10	LDA, LDT1, LDT2
	Site Preparation/Rough Grading	Vendor	10	10	HHDT, MHDT
	Site Preparation/Rough Grading[c][b]	Hauling	~~8~~52	42 ~~(296)~~	HHDT
4	Foundations	Worker	68	10	LDA, LDT1, LDT2
	Foundations	Vendor	16	10	HHDT, MHDT
	Foundations[c][b]	Hauling	~~25~~10	42 ~~(296)~~	HHDT
5	Trenching/Undergrounds	Worker	46	10	LDA, LDT1, LDT2
	Trenching/Undergrounds	Vendor	2	10	HHDT, MHDT
	Trenching/Undergrounds	Hauling	~~16~~9	42 ~~(296)~~	HHDT
6	Equipment, Structural Steel and Building Erection, and Piping	Worker	78	10	LDA, LDT1, LDT2
	Equipment, Structural Steel and Building Erection, and Piping	Vendor	22	10	HHDT, MHDT
	Equipment, Structural Steel and Building Erection, and Piping[b][a]	Hauling	1	42 (296)	HHDT
7	Electrical and Instrumentation	Worker	36	10	LDA, LDT1, LDT2
	Electrical and Instrumentation	Vendor	16	10	HHDT, MHDT
	Electrical and Instrumentation	Hauling	1	42	HHDT
8	Paving	Worker	22	10	LDA, LDT1, LDT2
	Paving	Hauling	12	42	HHDT
9	Painting/Insulation	Worker	4	10	LDA, LDT1, LDT2
	Painting/Insulation	Hauling	9	42	HHDT
10	Commissioning/Startup and Testing	Worker	28	10	LDA, LDT1, LDT2

Table 3-7. Construction Crew Vehicle Types

	Commissioning/Startup and Testing	Vendor	12	10	HHDT, MHDT
	Commissioning/Startup and Testing	Hauling	3	42	HHDT
11	Site Restoration	Hauling	14	42	HHDT
12	Decommissioning Demolition	Worker	28	10	LDA, LDT1, LDT2
	Decommissioning Demolition	Vendor	18	10	HHDT, MHDT
	Decommissioning Demolition[dc]	Hauling	3	20	HHDT

Notes:

[a] ~~No off road equipment is expected to be used for Phase 11, Site Restoration, so this phase is not included.~~

[ba] Vehicle mix: LDA=Light Duty Automobile, LDT1=Light Duty Trucks up to 3,750 pounds loaded vehicle weight (LVW), LDT2=Light Duty Trucks 3,750–8,500 pounds LVW, MHDT=Medium Heavy-Duty Trucks (8,500–14,000 pounds), HHDT=Heavy, Heavy-Duty Trucks (>14,000 pounds).

[cb] Hauling trip mileages for ~~Subsurface Exploration, Site Preparation/Rough Grading, Foundations, and Trenching phases~~Equipment, Structural Steel & Building Erection, and Piping (Phase 6) are average one-way distances from the Project Site to the County line for criteria pollutant emissions, because the trip destinations/directions are not known. The second value (in italics) is the one-way hauling distance from the Project Site to the Arizona state line, which is used to estimate greenhouse gas emissions.

[dc] Hauling trip mileages for Demolition phases (Phases 2 and 12) are CalEEMod defaults.

3.6.2 Construction Schedule

The anticipated construction schedule would be dependent on the regulatory review process, including issuance of any ministerial permits by the City. The proposed schedule and construction phases are provided in Table 3-8.

Table 3-8. Proposed Construction Schedule

Phase No.	Phase Work Description	Start Date[a]	Finish Date	Duration (Days)[b]
1	Subsurface Exploration	~~5~~10/1/2029	~~7~~12/3/2029	46
2	Existing Project Site/Paving Demolition	~~6~~11/15/2029	~~6~~11/29/2029	11
3	Site Preparation/Rough Grading (including setup of Construction Facilities	~~7~~12/4/2029	~~7~~12/2~~6~~5/2029	~~16~~17
4	Foundations	~~8/1~~1/2/2030	~~3/20~~8/22/2030	~~166~~167
5	Trenching/Undergrounds	~~2/1~~7/15/2030	~~4/19~~10/1/2030	~~56~~57
6	Equipment, Structural Steel and Building Erection, and Piping	~~10/1~~3/15/~~2029~~2030	~~7/22~~1/6/~~2030~~2031	~~211~~212
7	Electrical and Instrumentation	~~6/1~~11/27/2030	~~4/5~~10/1/2031	~~220~~221
8	Paving	~~6/1~~11/3/2031	~~7/27~~12/29/2031	~~40~~41
9	Painting/Insulation	~~7/1~~12/5/2031	~~8/26~~1/31/2032~~1~~	41
10	Pre-Commissioning, Commissioning, Startup and Testing (includes in-service date)	10~~5~~/30~~1~~/2031	~~9/30~~4/1/~~2031~~2032	~~109~~111
11	Post-Construction/Site Restoration	~~10/1/2031~~4/7/2032	~~10/31/2031~~ 5/5/2023	~~20~~21

Table 3-8. Proposed Construction Schedule

Phase No.	Phase Work Description	Start Date[a]	Finish Date	Duration (Days)[b]
12	Decommissioning	~~10/1/2032~~4/1/2033	~~12/30/2032~~ 7/1/2033	~~65~~66

Notes:

[a] The analysis in this PEA assumes a construction start date ~~May~~October 1, 2029, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and greenhouse gas emissions, because equipment and vehicle emission factors for later years would be lower due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

[b] Assumes a schedule of 10 hours per day, 5 days per week.

5.3 Air Quality

5.3.4 Impact Analysis

5.3b) 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?

Project Criteria Pollutant Emissions Impacts

Emissions of Criteria Pollutants during Project Construction

The Project's construction/demolition phases would produce many types of emissions; generally, particulate matter from combustion and fugitive dust are the pollutants of greatest concern. Construction related-emissions can cause temporary increases in localized concentrations of particulate matter, as well as affecting compliance with ambient air quality standards on a regional basis. The use of diesel-powered construction equipment emits particulate matter, as well as other typical combustion pollutants including the ozone precursors NO_x and ROCs. Use of architectural coatings and other materials associated with finishing buildings and equipment protection may also emit ROCs.

The California Emissions Estimator Model (CalEEMod) is a statewide emissions computer model designed to provide a uniform platform for government agencies and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations of a project. The model is distributed and maintained by the California Air Pollution Control Officers Association and is accepted by the California air districts. CalEEMod Version 2022.1.1.19 was used to estimate emissions from construction and demolition. Based on information from SoCalGas, construction is expected to start in 2029 and take approximately ~~30~~ 31 months. Decommissioning and removal of the existing natural gas compressors and demolition of the existing compressor building would not occur until at least a year after the new equipment have been operating, to ensure that the new equipment can operate in compliance under all operating conditions, and would take approximately 3 months. The construction activities would be divided into phases, as discussed in Chapter 3, Project Description, and the types, number, and sizes of construction equipment and motor vehicles to be utilized have been estimated based on information from SoCalGas and default information in CalEEMod. The assumptions regarding the construction and demolition emissions calculations are provided in the Air Quality and GHG Technical Report in Appendix B.

VCAPCD's Air Quality Assessment Guidelines provide significance thresholds for construction-related emissions of 25 pounds per day each of NO_x and ROC emissions from construction activities related to a project (VCAPCD 2003). As outlined in Section 5.3.7.2 below, emissions of NO_x and ROCs associated with the construction and demolition phases of the Project would be below the significance threshold of 25 pounds per day for both pollutants.

The VCAPCD Air Quality Assessment Guidelines do not include numeric significance thresholds for pollutants other than NO_x and ROCs. Besides ozone, only PM_{10} is designated as nonattainment in Ventura County. For construction impacts, rather than having numeric significance thresholds for PM_{10}, the VCAPCD recommends minimizing fugitive dust through dust control measures. The fugitive dust control measures required by VCAPCD Rule 55 – Fugitive Dust and the actions recommended by the CPUC (2019) that would be implemented as part of the Project (CPUC-AIR-1 [Dust Control during Construction]) are outlined in Section 5.3.7.1, CPUC Recommended Environmental Measures.

Table 5.3-3 shows the criteria pollutant construction and demolition peak day emissions as estimated using CalEEMod including the use of construction equipment best management practices (BMPs) and CPUC-recommended fugitive dust control measures. The analysis provided in the Air Quality and GHG Technical Report in Appendix B looked at each construction and demolition phase to determine which phase would have the maximum daily emissions. The construction schedule also indicated that there could be some overlap between various phases, so the peak day emissions from each phase that might overlap were added together to give a conservative total peak day emissions. Demolition of some of the existing structures is not expected to occur until approximately 1 year after the new equipment has been operating and is shown separately from construction. The methodology and assumptions used for the calculations are described in the Air Quality and GHG Technical Report in Appendix B. The CalEEMod output files are provided in Attachment A.1, ~~and~~ A.2, and A.3 of Appendix B.

As shown in Table 5.3-3, mass emissions of ROCs and NO_x during Project construction would be below the VCAPCD significance thresholds for these pollutants. There are no thresholds for the other criteria pollutants; however, estimated emissions for CO, SO_x, PM_{10}, and $PM_{2.5}$ are presented for informational purposes as required by CPUC (2019). Based on this analysis, and pursuant to Section 5.3.7.2, the Project's criteria pollutant emissions during construction and demolition would not be expected to have a significant impact on air quality.

Table 5.3-3. Construction and Demolition Emissions Summary and Significance Evaluation

Criteria Pollutants	Project Peak Day Emissions[a,b] (Pounds/Day)	Threshold (Pounds/Day)[c,d]	Significant?[c]
Construction Emissions			
ROCs	6.~~3~~1	25	No
NO_x	~~20.0~~19.3	25	No
CO	~~89.7~~67.9	N/A	N/A
SO_x	0.~~3~~1	N/A	N/A
Total PM_{10}[c]	4.~~8~~5	N/A	N/A
Total $PM_{2.5}$[c]	1.~~6~~0	N/A	N/A

Table 5.3-3. Construction and Demolition Emissions Summary and Significance Evaluation

Criteria Pollutants	Project Peak Day Emissions[a,b] (Pounds/Day)	Threshold (Pounds/Day)[c,d]	Significant?[c]
Demolition Emissions			
ROCs	0.~~35~~	25	No
NO_x	~~3.6~~7.1	25	No
CO	~~12.6~~19.5	N/A	N/A
SO_x	0.04	N/A	N/A
Total PM_{10}[c]	0.~~6~~7	N/A	N/A
Total $PM_{2.5}$ [c]	0.2	N/A	N/A

Notes: ROC = reactive organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; N/A = not applicable; SO_x = sulfur oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter.

[a] Emissions from CalEEMod Version 2022.1.~~1~~1.19 in pounds/day are winter or summer maxima for planned activity, and reflect a combined total peak day for construction phases with potential for overlap. ~~The analysis conservatively reflects a construction start date of May 2029, although current expectations are that construction would more likely begin a few months later.~~

[b] Per the VCAPCD Air Quality Assessment Guidelines (2003), construction-related emissions would be considered to be significant if estimates of NO_x and ROC emissions from the heavy-duty construction equipment exceed the 25 pounds/day threshold.

[c] Total PM_{10} and $PM_{2.5}$ include engine exhaust and fugitive dust and are minimized in accordance with VCAPCD Rule 55 and the fugitive dust control measures and off-road equipment BMPs.

[d] VCAPCD Air Quality Assessment Guidelines (2003) do not provide thresholds for criteria pollutants other than ROCs and NO_x. Other criteria pollutant emissions are listed for reference and the significance is listed as N/A (not applicable).

Emissions of Criteria Pollutants during Project Operation

The CPUC Guidelines (2019) require that the air quality analyses quantify the expected emissions of criteria pollutants from all project-related sources. Stationary-source Project criteria pollutant emissions were estimated on a maximum potential to emit (PTE) basis that assumes continuous operation (8,760 hours per year operation) of the two new 1,900 HP natural gas compressors and 1,000 hours per year for the new standby generator for consistency with maximum allowed usage under the air permit. Manufacturer's data and emission factors applicable to the proposed equipment were used to determine the PTE. To determine the net emissions for the Project, accounting for the existing facility, baseline emissions were estimated for the three existing 1,100 HP natural gas compressors and the existing diesel emergency generator. The baseline period was defined as the average of the two most recent years with actual emissions, 2021 and 2022, and baseline emissions were calculated using the average of the existing equipment's 2021 and 2022 fuel usage. Additional details of the net emissions calculations are provided in the Air Quality and GHG Technical Report in Appendix B.

Emissions of criteria pollutants from the small number of vehicles to be used by compressor station employees during operations were estimated using EMFAC2021 Version 1.0.2 (CARB 2022b) for combustion emissions and EPA's AP-42 fugitive dust emissions estimation techniques for paved roads (EPA 2011). The Project's operational vehicle miles traveled analysis assumes four employees commuting daily in separate light-duty vehicles for a typical one-way distance of 32 miles within Ventura County. Baseline vehicle use assumed three worker vehicles.

Table 5.3-4a shows the baseline emissions, which are the average of the last ~~2~~two years of actual emissions (from 2021 and 2022) for the three existing natural gas compressors and emergency diesel generator, as well as emissions from commuting vehicles for the workers. Table 5.3-5 shows the Project emissions based

on the PTE of the replacement units (two new natural gas compressors and one new natural gas standby generator) plus worker vehicles. The Project net emissions during operation were calculated based on the difference between the PTE for the new engines and the historical actual emissions for the existing engines, as presented in Table 5.3-6. Separately, the Project would be required to comply with VCAPCD Rule 26.2 – New Source Review Requirements during the permitting process. Additional details on these emissions calculations are provided in the Air Quality and GHG Technical Report in Appendix B.

5.3c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less-Than-Significant Impact. The Project would not expose sensitive receptors to substantial pollutant concentrations.

The locations of the nearby sensitive receptors are discussed in Section 5.3.1.4, Sensitive Receptor Locations. The closest school that may be affected by the Project is the E.P. Foster Elementary School, which is located to the east of the facility, directly across from the Project Site on North Olive Street. Two daycare/preschool properties are also located within 1,000 feet of the Ventura Compressor Station property. In addition to these non-residential sensitive receptors, there are single-family residences located in the immediate vicinity of the facility, which borders the facility's fenceline in the northeastern corner along North Olive Street.

The discussion below presents the results of health risk assessments to provide the potential for construction and operation to expose sensitive receptors to substantial concentrations of TACs, as required by the VCAPCD Air Quality Assessment Guidelines. Analyses conducted to determine the Project's criteria pollutant impacts on air quality are discussed in Section 5.3b of this impact analysis.

Health Risk Assessment for Project Construction

During construction and demolition, the use of diesel-fueled equipment on the Project Site would emit DPM. DPM emissions are derived from the CalEEMod runs in Attachment A.1 of Appendix B, where DPM is conservatively assumed to be 100% of the exhaust PM_{10} emissions. The DPM emissions from Project construction reflect BMP-AIR-1 (NO_x and DPM Emissions Minimization during Construction), presented in Section 5.3.7.2.

Because Project construction and demolition activities would last approximately 3 years, cancer risk was estimated for a 3-year period using the average annual DPM emissions from CalEEMod over the entire construction period to estimate impacts at sensitive, residential, and off-site worker receptors. Although most of the demolition activities would occur at a later time, the emissions from this later phase were included in the construction HRA. Although the demolition activities that occur after construction would overlap with Project operation, the overlap period would be short (approximately 3 months) and the combination of the construction and operation health impacts would be below the significance thresholds based on information provided in Table 5.3-9 and Table 5.3-10. If the values are summed, the totals would still be below the significance thresholds. DPM does not have acute Risk Exposure Levels (RELs); therefore, acute risks are not estimated for construction activities. The construction HRA was conducted in accordance with VCAPCD guidance and per the OEHHA Risk Assessment Guidelines (2015). The HRA used refined air dispersion analyses and health risk modeling. The Hotspots Analysis and Reporting Program, Version 2 (HARP2) software was used to perform the calculations, using imported Project AERMOD values.

Additional details on the construction HRA methodology, input parameters, and results are provided in the Air Quality and GHG Technical Report in Appendix B.

The construction HRA results are summarized in Table 5.3-9. The results show that, for all receptor types and locations, the predicted health impacts would be less than the VCAPCD cancer significance threshold and below the non-cancer thresholds; therefore, impacts from Project construction and demolition would be less than significant.

Table 5.3-9. Construction Health Risk Assessment Results

Predicted Health Impact	Maximally Exposed Individual Residential	Maximum Impact at a Non-Residential Sensitive Receptor	Maximally Exposed Individual Worker	VCAPCD CEQA Threshold	Significant?
Cancer Risk (in one million)	~~2.30~~1.92	1.~~49~~24	0.~~31~~28	10	No
Chronic Hazard Index (HIC)	0.001	0.001	0.002	1	No

Notes: VCAPCD = Ventura County Air Pollution Control District; CEQA = California Environmental Quality Act.
Because diesel particulate matter (DPM) does not have an identified acute risk, no HIA was modeled for construction.

5.6 Energy

5.6.4 Impact Analysis

5.6a) 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. The Project would not use energy in a wasteful and/or inefficient manner because the new replacement equipment would be more energy efficient than the existing equipment. Energy use during construction and operation of the Project is provided below. Additional details of the energy calculations during Project operation are provided in Attachment F of Appendix B, Air Quality and GHG Technical Report.

Project Construction/Demolition

Energy/fuel use for construction and demolition were derived from the estimated carbon dioxide (CO_2) emissions generated, using the California Emissions Estimator Model (CalEEMod; CAPCOA 2022). CalEEMod calculates mass emissions of GHGs, including CO_2, from offroad and onroad mobile sources associated with Project construction and demolition. For construction and demolition, CalEEMod aggregates mobile source CO_2 emissions into four broad categories (typical fuel types assumed):

- Offroad diesel equipment
- Hauling (heavy-heavy-duty diesel trucks [HHDT])
- Vendor (medium-heavy- and heavy-heavy-duty diesel trucks [MHDT, HHDT])

- Worker (light-duty gasoline automobiles and trucks [LDA, LDT1, LDT2])

For each category, diesel and gasoline fuel consumption can be estimated (back-calculated) using 2020 Climate Registry (40 CFR, Part 98[C]) emission factors for those fuels:

- Diesel Fuel Oil No. 2: 10.21 kilograms (kg) CO2 per gallon (22.51 pounds of CO2 per gallon)
- Gasoline: 8.78 kg CO2 per gallon [19.36 pounds of CO2 per gallon].

Using the CalEEMod annual GHG emissions results (metric tons [MT] CO_2) for the four mobile source categories (offroad, hauling, vendor, worker) and the corresponding CO_2 emission factors, Table 5.6-2 shows the estimated fuel consumption during construction and demolition of the Project. In combination, based on CalEEMod, Project construction and demolition activities were estimated to consume approximately ~~566,790~~288,600 gallons of diesel fuel and 15,~~380~~ 600 gallons of gasoline (CAPCOA 2022; TCR 2022).

Table 5.6-2. Estimated Construction/Demolition Motor Vehicle and Construction Equipment Fuel Consumption

Phase	Mobile Sources	Types[a]	Fuels	CO_2 Emissions[b] (MT)	CO_2 Emission Factor[c] (kg/gallon)	Fuel Consumption (gallons)
Construction	Worker	LDA, LDT1, LDT2	Gasoline	~~130~~131	8.78	14,970
	Vendor, Hauling	MHDT, HHDT	Diesel	~~2,523~~532	10.21	~~247,080~~52,080
	Offroad	Tier 4	Diesel	~~3,153~~2,291	10.21	~~308,810~~224,400
Demolition	Worker	LDA, LDT1, LDT2	Gasoline	5	8.78	590
	Vendor, Hauling	MHDT, HHDT	Diesel	~~19~~18	10.21	~~1,860~~1,770
	Offroad	Tier 4	Diesel	~~92~~105	10.21	~~9,040~~10,300

Notes: CO_2 = carbon dioxide; MT = metric tons; kg = kilograms.

[a] Vehicle mix: LDA = Light-Duty Automobile; LDT1 = Light-Duty Trucks up to 3,750 pounds loaded vehicle weight (LVW); LDT2 = Light-Duty Trucks 3,750–8,500 pounds LVW; MHDT = Medium-Heavy-Duty Trucks (8,500–14,000 pounds), HHDT = Heavy-Heavy-Duty Trucks (>14,000 pounds); Tier 4 refers to EPA Tier 4 emissions standards for offroad equipment.

[b] CO_2 emissions from CalEEMod outputs in Attachment A.~~2~~ 3 of Appendix B, Air Quality and GHG Technical Report.

[c] Emission factors from TCR 2022 and 40 CFR 98(C).

As discussed in PEA Section 2.1.1, Purpose and Need, construction of the Project is necessary to meet SoCalGas's statutory obligation to provide reliable natural gas service to its customers. The use of fuels (diesel and gasoline) during construction and demolition is temporary and, based on the anticipated construction equipment and vehicles for the Project, is within the capacity of the current diesel and gasoline fuel delivery systems. Therefore, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction/demolition.

5.8 Greenhouse Gas Emissions

5.8.4 Impact Analysis

5.8a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG Emissions from Project Construction and Demolition

During construction and demolition activities, GHGs—primarily CO_2, CH_4, and N_2O, collectively reported as CO_2e—are directly emitted from mobile sources such as on-road vehicles and off-road construction equipment. Direct on-site and off-site GHG emissions were estimated for the Project construction and demolition activities using California Emissions Estimator Model (CalEEMod) Version 2022.1.1.19 (CAPCOA 2022). CalEEMod also includes a calculation of GHG emissions related to refrigerants and ozone (O_3) depleting substances (R/ODS), mainly from heating, ventilation, and air-conditioning (HVAC) units in office buildings and vehicles.

Table 5.8-2 shows a breakdown of estimated Project construction GHG emissions over the roughly 2531-month main construction period (2029–20312032) and the estimated 3-month demolition period (20322033) which will occur approximately a year after the new equipment starts operation. Table 5.8-2 also aggregates the CO_2e emissions for all construction phases and determines the 30-year amortization amount to be included with the operational GHG netting analysis. The maximum annual GHG emissions from construction is 2,7311,777 MT CO_2e in 2030. Together, construction and demolition emissions amortized over 30 years are 198 105 MT CO_2e per year (see Appendix B for additional information on the construction and demolition assumptions).

Table 5.8-2. Construction and Demolition GHG Emissions by Year (2029–20322033)

Greenhouse Gas	Construction				Demolition	Total (MT)	30-Year (MT/year)
	2029 (MT)	2030 (MT)	2031 (MT)	2032 (MT)	20322033 (MT)		
CO_2	2,549234	2,6771,756	580815	166	4129	—	—
CH_4	0.060.01	0.0806	0.0203	0.01	00.00	—	—
N_2O	0.250.02	0.170.06	0.010.02	0.01	00.00	—	—
R/ODS	1.250.08	0.840.34	0.040.10	0.04	00.01	—	—
CO_2e	2,625239	2,7311,777	583822	168	4130	5,9433,136	198105

Notes: GHG = greenhouse gas; MT = metric tons; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R/ODS = refrigerants and ozone-depleting substances; CO_2e = carbon dioxide equivalent.
~~This analysis assumes that construction will start in May 2029, and although it now appears that it will start a few months later, the earlier start is conservative (i.e., higher emissions, since older vehicles have higher emissions).~~

Determination of GHG Emissions Significance

Table 5.8-5 provides a comparison of the aggregated net GHG emissions for the Project to the significance threshold. The net GHG emissions reflect the direct and indirect GHG emissions from the Project

(Table 5.8-4) plus the amortized GHG construction emissions (Table 5.8-2) minus the baseline GHG emissions (Table 5.8-3).

As shown in Table 5.8-5, the aggregated GHG net emissions show a small decrease in GHG emissions associated with the Case 1 Project and a small increase for the Case 2 Project compared to the baseline. This result shows that the GHG emissions associated with the projected future operation of the Project would be similar to those associated with the operation of the existing Ventura Compressor Station. Further, the slightly larger electric compressors assumed in Case 1 would lead to a reduction in GHG emissions. In both cases, the net decrease or increase in emissions is below the CO_2e significance threshold of 10,000 MT/year; therefore, the Project would have a less-than-significant impact.

Table 5.8-5. Project GHG Emissions Significance Evaluation

Item	Annual CO_2e Net Emissions (MT/year)	
	Case 1	Case 2
Total Direct Project Net Emissions (Project − Baseline)	(3,042)	(1,693)
Total Indirect Project Net Emissions (Project − Baseline)	2,453	2,133
Amortized Construction Emissions (30 years)	~~198~~105	~~198~~105
Total Operation Net Emissions + Construction	(~~391~~484)	~~639~~545
Significance Threshold	**10,000**	**10,000**
Total Project Net Emissions Significant?	**No**	**No**
Mitigation Required	**None**	**None**

Notes: GHG = greenhouse gas; CO_2e = carbon dioxide equivalent, MT = metric tons.

4 Errata

4.1 Editorial Revisions

The revisions to the PEA in this Errata section are editorial in nature and merely clarify or make insignificant modifications to the existing text. These minor text edits to the PEA do not constitute significant new information that alters the conclusions of the PEA or results in any new significant environmental impacts.

4.2 Errata Text Changes

Revisions to the PEA are shown below as excerpts from the PEA text. Added or modified text is in double-underline format, while deleted text is shown as strikeout text ~~(example)~~.

3 Project Description

Table numbers have been updated as follows to reflect the addition of Tables 3-1 through 3-4 and Table 3-9 as detailed in Chapter 3 of this document:

3-1 Emergency Shutdown System
3-2 Pressure Relief Devices
3-3 Gas Detection Sensors
3-4 Vibration Monitoring System
3-~~1~~5 Dimensions of Structures
3-~~2~~6 Gas Piping Tie-Ins and Sizes
3-~~3~~7 Below-Grade Piping Diameter and Length
3-~~4~~8 Above-Grade Piping Types and Sizes
3-9 Preliminary Estimates for Construction Water Usage
3-~~5~~10 Construction Workforce Specifications
3-~~6~~11 Project Off-Road Construction Equipment
3-~~7~~12 Construction Crew Vehicle Types
3-~~8~~13 Proposed Construction Schedule

4 Description of Alternatives

4.2.2 Energy Efficiency Non-Pipeline Alternative

[1] The California Energy Commission first developed the Appliance Energy Efficiency Standards (20 CCR 1601–1609) in 1977. They apply to appliances sold or offered for sale in California to reduce the inefficient consumption of energy and water by prescribing efficiency standards and other cost-effective measures for appliances whose use requires a significant amount of energy or water statewide (CEC 2023a).

5.1 Aesthetics

5.1.2.2 State

California Scenic Highway Program

Created by the California State Legislature in 1963, the California Scenic Highway Program includes highways designated by Caltrans as scenic. The purpose of the program is to protect the scenic beauty of California highways and adjacent corridors through conservation and land use regulations. For a highway or route with "outstanding scenic qualities" to be included in the program and on the list of eligible state scenic highways maintained by Caltrans, it must first be nominated by the city or county where it is located. The nomination/eligibility process entails that a city/county identify and define the scenic corridor of the highway to better understand the extent of visual resources requiring conservation. For an eligible highway to be officially designated and included in the program, the local government with jurisdiction over lands abutting the highway must implement a scenic highway corridor protection program that safeguards the scenic appearance of the corridor. Corridor protection may be achieved through a variety of means, including regulation of land uses and intensity of development, detailed land and site planning, control of outdoor advertising, consideration of earthmoving and landscaping, and design and appearance of structures and equipment. If the local Caltrans district and Scenic Highway Program coordinators determine that the corridor protection program adequately safeguards the scenic appearance of the corridor, a recommendation to designate the highway as scenic is forwarded to the Caltrans Director (Caltrans 2008).

General Plan Action 4.37 states that the City will "[r]equest that State Route 126 and 33, and U.S. HWY 101 be designated as State Scenic Highways" (City of Ventura 2005a); however, as of March 2023, there are no officially designated scenic highways within the City (Caltrans 2023a). As discussed in Section 5.1.1.2, SR-33 and U.S. Route 101 are identified by Caltrans as eligible scenic highways but to date no corridor protection programs have been implemented for segments of these highways traversing the City (Caltrans 2023a). A segment of SR-33 that has been designated is approximately 14 miles north of the Project Site (Caltrans 2023a).

5.1.4 Impact Analysis

Methodology and Assumptions

Analysis of Selected Viewpoints

Public visibility of the site was assessed based on Project Site reconnaissance, aerial maps, existing and proposed infrastructure/components, and a visibility analysis conducted for the Project using Esri's ArcGIS 3D Analyst extension. The visibility analysis as shown in Figure 5.1-1 allowed analysts to determine conservative relative visibility of the Project Site at buildout from ground-level vantage points within the Project viewshed. As stated previously, viewshed analysis does not consider reduced visibility due to distance, intervening buildings, structures, or trees.

Scenic resources and other potential vantage points including scenic highways and public trails were identified via review of adopted plans (specifically, the City General Plan), the State Scenic Highway System managed by Caltrans, and the public database of trails maintained by the AllTrails application (i.e., alltrails.com) (City of Ventura 2005a; Caltrans 2023a; AllTrails 2023). Together, these considerations were used to determine the most appropriate KOPs. Within publicly accessible areas with a high range of Project Site visibility, the vantage points with the highest "exposure potential" (e.g., higher trafficked or visited areas) or vantage points where the Project Site could be

viewed together with visually sensitive resources (e.g., where the Project Site could be backdropped by natural areas or hillsides) were used to select the final KOPs. Based on this selection process, five KOPs were selected, as listed below:

5.8 Greenhouse Gas Emissions

5.8.1.2 Potential Effects of Climate Change

… The California Natural Resources Agency has released four California Climate Change Assessments (2006, 2009, 2012, and 2018), which have addressed the acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, and ocean acidification, hypoxia, and warming. To address local and regional governmental needs for information to support action in their communities, the California Natural Resources Agency's Fourth Assessment (2018) includes reports for nine regions of the state, including the Los Angeles region which includes Ventura County, where the Development Area is located. Key projected climate changes for Ventura County as part of the Los Angeles region include the following (CNRA 2018~~a~~):

5.8.4 Impact Analysis

Analysis of Selected Viewpoints

5.8a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG Emissions from Project Construction and Demolition

During construction and demolition activities, GHGs—primarily CO_2, CH_4, and N_2O, collectively reported as CO_2e—are directly emitted from mobile sources such as on-road vehicles and off-road construction equipment. Direct on-site and off-site GHG emissions were estimated for the Project construction and demolition activities using California Emissions Estimator Model (CalEEMod) Version 2022.1 (CAPCOA 2022). CalEEMod also includes a calculation of GHG emissions related to refrigerants and ozone (O_3) depleting substances (R/ODS), mainly from heating, ventilation, and air-conditioning (HVAC) units in office buildings and vehicles.

5.11 Land Use and Planning

This section describes existing conditions and potential impacts on land use and planning as a result of construction, operation, and maintenance of the proposed Ventura Compressor Modernization Project (Project). Information contained in this section is based on publicly available documents and land use data, including the City of Ventura (City) General Plan (City of Ventura 2005~~a~~); County of Ventura (County) General Plan (County of Ventura 2020); City and County zoning maps and municipal codes (City of Ventura 2022; County of Ventura 2023a); and City and County interactive mapping tools (City of Ventura 2023; County of Ventura 2023b). Other sources consulted are listed in Chapter 9, References, of this Proponent's Environmental Analysis (PEA).

5.11.1.1 Land Use

Development Area Land Use Designation and Zoning

The Development Area is in the Westside Community of the City. The Project Site is on an approximately 8.42-acre parcel (Assessor's Parcel Number [APN] 068-0-142-030) located at 1555 North Olive Street. An approximately 2.53-acre temporary construction Staging Area would be located adjacent to the west side of the Project Site on the T&T Crane property (i.e., the southern portion of APN 068-0-142-020). Figure 3-1, Project Site and Surrounding Land Uses, in PEA Chapter 3, Project Description, provides an aerial view of the Development Area. The Development Area's General Plan land use designation is Industry, which "encourages intensive manufacturing, processing, warehousing and similar uses, as well as light, clean industries and support offices" (City of Ventura 2005~~a~~). The Development Area's zoning is M-2 (General Industrial Zone), which allows for uses that include "Utility or Equipment Substations," defined as "electrical substations, natural gas pumping stations, transmitters, or translators, and utility relay or monitoring facilities" (City of Ventura 2023, Sections 24.115.3440 and 24.262.030).[6] Figures 5.11-1 and 5.11-2 illustrate the current City General Plan land use (Industry) and zoning (M-2) designations for the Development Area. Table 5.11-1 identifies land use designations and zoning for the Development Area and surrounding uses (discussed following the table).

Table 5.11-1. Land Use and Zoning

Use/Feature	Location	Land Use Designation	Zoning
Development Area (On and Off Site)			
Project Site (i.e., Ventura Compressor Station)	On site	Industry	M-2
Staging area (i.e., T&T Crane)	Off site (adjacent to the W of the Project Site)	Industry	M-2
West of North Olive Street (Off Site)			
Industrial	Adjacent to Development Area to the N and S	Industry	M-2
Single-family residence and storage yard	Adjacent to the NE corner of the Project Site	Industry	M-2
Industrial alleyway	Adjacent to the Staging Area to the W	Industry	M-2
Ventura River Trail	W of Development Area (adjacent to and E of SR-33)	Not Designated – ROW	ROW
SR-33	W of Development Area	Not Designated – ROW	ROW
Ventura River	W of Development Area (adjacent and west of SR-33)	Open Space (County)[a]	OS-160; HCWC (County)[b]
Hillsides, open space, and agriculture	W of the Ventura River and SR 33	Open Space (County)[a]	AE-40; OS-160 (County)[b]

6 CPUC has overarching authority of natural gas utilities. Article XII, Section 8 of the California Constitution establishes CPUC's preemptive authority over matters over which the Legislature has granted CPUC regulatory powers. CPUC decisions, as well as California courts, have confirmed CPUC's preemptory powers. As such, no local discretionary (e.g., rezone, land use) permits would be required because CPUC has preemptive jurisdiction over the siting, construction, maintenance, and operation of natural gas facilities in California. CPUC's authority does not preempt special districts, such as air quality management districts, other state agencies, or the federal government. Additionally, SoCalGas would still have to obtain all ministerial permits from local jurisdictions.

Table 5.11-1. Land Use and Zoning

Use/Feature	Location	Land Use Designation	Zoning
East of North Olive Street (Off Site)			
E.P. Foster Elementary School	E of the Project Site (S of W. McFarlane Ave.)	Public/Institutional	R-1
Vacant building	E of Project Site (S of E.P. Foster Elementary School)	Public/Institutional	R-1
Residential	E of Project Site (N of West McFarlane Ave.)	Neighborhood Low	R-1
Industrial	E of Project Site (adjacent to residential use N of West McFarlane Ave.)	Industry	M-1

Sources: City of Ventura 2005, 2023; County of Ventura 2020, 2023b.
Notes: M-2 = General Industrial Zone; W = west; N = north; S = south; NE = northeast; E = east; SR = State Route; ROW = public right-of-way; OS = Open Space; HCWC = Habitat Connectivity Wildlife Corridor; AE = Agricultural Exclusive; R-1 = Single-Family Zone; M-1 = Limited Industrial Zone.
Unless otherwise indicated, land use designations and zoning are per the City General Plan and City Municipal Code, respectively.
[a] County General Plan (County of Ventura 2020).
[b] County Municipal Code (County of Ventura 2023a).

5.11.2.4 Local

City of Ventura General Plan

The City's General Plan was adopted on August 8, 2005, and evolved from the 2000 Ventura Vision strategies reflecting the planning objectives and smart growth principles of the community (City of Ventura 2005a). The City General Plan is the City's comprehensive framework of guiding policies on land use, housing, roads, recreation, historical and natural resources, balance of adequate water supply infrastructure, public safety services, and noise, and serves as a basis for regulatory and land use planning decisions. Each chapter, or element, of the General Plan includes a set of policies and actions to guide future decision making in the City.

As previously stated, the Project is not subject to local discretionary land use regulations. However, consistent with GO 177, which requires that public utilities "consult with local agencies regarding land use matters," SoCalGas has considered the following General Plan policies and actions (City of Ventura 2005a) in determining the design of the Project:

5.11.4 Impact Analysis

5.11b) 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 Project is consistent with the City's land use designation of Industrial and zoning of M-2. The Development Area's General Plan land use designation is "Industry," which "encourages intensive manufacturing, processing, warehousing and similar uses, as well as light, clean industries and support offices" (City of Ventura 2005a). According to City Municipal Code Section 24.115.3440, allowable uses within the M-2 zone include "Utility or Equipment Substations," which are defined as "electrical substations, natural gas pumping stations, transmitters, or translators, and utility relay or monitoring facilities" (City of Ventura 2023). The existing compression equipment was installed at the Project Site in the 1980s, and a

compressor station has been in use at this site since at least 1923. The site would remain a compressor station under proposed conditions, which is an allowable use under the City's Industry designation and M-1 zoning. Per City Municipal Code Section 24.262.070(C), the maximum height of any building or structure in the M-2 zone is 75 feet. As discussed in Chapter 3, the tallest Project Site components are the two new 64-foot-tall exhaust stacks and the 62.5-foot-tall blowdown stack. Thus, the Project would be consistent with the existing City land use (Industry) and zoning (M-2). In addition, as described throughout this PEA, the Project substantially complies with the City's General Plan, the Westside Community Plan, and the Municipal Code.

5.14 Population and Housing

5.14.1.3 Housing Estimates

As shown in Table 5-14.1, the SCAG planning area is expected to see a growth in housing units from approximately 6,333,000 units in 2020 to 7,633,000 units in 2045 (SCAG 2020a). This is an annual growth rate of approximately 52,000 units, or 0.82%. Additionally, SCAG estimates that that number of housing units in the County will increase from approximately 278,000 units in 2020 to approximately 306,000 units in 2045. This represents an annual growth rate of approximately 1,120 units, or 0.32%.

According to SCAG's housing projections for the City, the City had approximately 41,282 housing units in 2020, and is projected to have approximately 46,700 units in 2045. This represents an annual growth rate of approximately 217 units per year, or 0.53%. Furthermore, according to the City's General Plan Housing Element, the City has been allocated a Regional Housing Needs Assessment of 5,312 units (City of Ventura 2022). At the time of the adoption of the City's Housing Element, the City's approved housing projects offered a capacity of 1,006 units (City of Ventura 2022). Therefore, the City will seek to add an additional 4,306 housing units by 2029 (City of Ventura 2021~~1~~2).

5.15 Public Services

5.15.2.2 State

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies, in addition to authorizing video franchises. SoCalGas is specifically overseen by CPUC's Gas Safety and Reliability Branch. The Gas Safety and Reliability Branch ensures that intra-state natural gas and liquid petroleum gas pipeline systems are designed, constructed, operated, and maintained according to safety standards set by CPUC and the federal government, as compared to interstate pipelines, which are regulated by PHMSA. The Gas Safety and Reliability Branch oversees the operation and safety of the five major investor-owned utilities that serve natural gas to California customers, including SoCalGas (CPUC 2023).

CPUC has established several General Orders (GOs) that provide requirements for safe construction and operation of natural gas infrastructure, including GO 58-A (Standards for Gas Service in the State of California) (CPUC 1992), and GO 112-F (State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems) (CPUC 2015).

5.18 Tribal Cultural Resources

5.18.1.3 Ethnographic Study

Ethnographic Context

Ventureño Chumash

…Review of various ethnographic studies and historic maps (King 19~~6~~75; Johnson et al. 1999; Brown 2001; Grant 1978) indicate that while no known TCRs have been identified within the Development Area, prehistoric utilization of the nearby Ventura River was extensive. Several Chumash placenames were identified within the Project vicinity, including the villages of *quyuy*, *kamexmey*, *micqanaqan*, and *šišolop* (King 1975). The site of the historic village of *šišolop* or *Shisholop* (CA-VEN-3) is located approximately 1.4 miles south of the Development Area near the base of Figueroa Street (see Exhibit 1 in Appendix E). The village dates from approximately AD 1000 and extends into the historic period, being visited by Juan Rodriguez Cabrillo in 1542. *Shisholop* ("in the mud") is estimated to have stretched from the beach inland past the San Buenaventura Mission and served as home to 300–400 Chumash at its peak. The location of the village and the Cabrillo Landing was designated as a historical point of interest with the City of Ventura.

5.20 Wildfire

5.20.2.4 Local

City of Ventura Emergency Response and Evacuation Plans

As discussed in Section 5.20.1, Environmental Setting, the EOP is the primary emergency response plan for the City. The EOP addresses the City's planned response to significant emergencies. The EOP does not address routine day-to-day emergencies. Instead, the operational concepts reflected in the EOP focus on large-scale disasters that exceed the City's resources and require an emergency response. The EOP is designed to be exercised before an emergency and to include the City as part of SEMS and the NIMS. Each element of the emergency management organization is responsible for assuring the preparation and maintenance of appropriate and current Standard Operating Procedures (SOPs), resource lists, and checklists that detail how assigned responsibilities are performed to support implementation of the EOP and to ensure an effective response during a disaster. Such SOPs include the specific emergency authorities that designated officials and their successors can assume during emergencies. The EOP also recognizes the following local/regional emergency response and evacuation plans that augment or inform the EOP (~~City~~ County of Ventura 2021):

6 Comparison of Alternatives

6.2.1 No Project Alternative

Land Use and Planning

The No Project Alternative would be located on the same Project Site as the Project. The Project Site is within the City of Ventura (City) Industrial land use designation and the M-2 zone. SoCalGas has consulted with local agencies regarding land use matters potentially affected by the Project. According to City Municipal Code Section 24.115.3440, allowable uses within the M-2 zone include Utility or Equipment Substations, which are

defined as "electrical substations, natural gas pumping stations, transmitters, or translators, and utility relay or monitoring facilities" (City of Ventura 2022a). Therefore, although not subject to local land use regulations, the Project is consistent with local land uses. In accordance with CPUC General Order 177, the Project is not required to obtain a conditional use permit (City Municipal Code Section 24.262.030). Therefore, similar to the Project, the No Project Alternative would not conflict with any applicable City General Plan land use policies and the existing compressor station is consistent with the existing City land use (Industrial) and zoning (M-2) for the Project Site. Short- and long-term impacts for the No Project Alternative would be similar to those of the Project and impacts would be no more localized or widespread because the No Project Alternative would be located on the Project Site.

6.2.2 Supplemental EDC Installation Only

Land Use and Planning

The Supplemental EDC Alternative would be located on the same Project Site as the Project. The Project Site is within the City Industrial land use designation and M-2 zone. SoCalGas has consulted with local agencies regarding land use matters potentially affected by the Project. According to City Municipal Code Section 24.115.3440, allowable uses within the M-2 zone include Utility or Equipment Substations, which are defined as "electrical substations, natural gas pumping stations, transmitters, or translators, and utility relay or monitoring facilities" (City of Ventura 2022a). Therefore, although not subject to local land use regulations, the Project is consistent with local land uses. In accordance with CPUC General Order 177, the Project is not required to obtain a conditional use permit (City Municipal Code Section 24.262.030). Similar to the Project, the Supplemental EDC Alternative would not conflict with any applicable City General Plan land use policies and the compressor station would remain consistent with the existing City land use (Industrial) and zoning (M-2) for the Project Site. Short- and long-term impacts for the Supplemental EDC Alternative would be similar to those of the Project and impacts would be no more localized or widespread because the Supplemental EDC Alternative is located on the Project Site.

6.2.5 Ventura Steel Site

Aesthetics

The Ventura Steel Site is located within the local valley landscape to the east of SR-33 (and east of Ventura Avenue). Although the site is visible from SR-33, the valley landscape has been visibly altered by previous development, including oil wells, storage tanks, storage yards, and wooden and metallic siding structures supporting industrial and commercial businesses. Development of the Ventura Steel Site would not result in damage to a scenic resource (the site encompasses relatively flat and previously developed terrain) and would not obstruct or otherwise degrade an existing view to a valued scenic resource such as hillsides. Construction of off-site pipelines is likely to result in temporary contrasting lines and scars on hillsides that would be visible from SR-33; however, due to the temporal nature of the disturbance (which would revegetate over time) and the degraded visual character caused by the visible oil/gas uses in the vicinity, pipeline installation is not anticipated to create substantial effects to existing visual character. Approximately 37 electrical poles would be installed from the Ventura Steel Site to connect to an existing electrical line to the San Nicholas Circuit. The installation of poles would slightly expand the viewshed of project components and would result in some additional view degradation, although the surrounding area currently includes multiple utility poles/lines that traverse the area and Ventura Avenue. Development of the Ventura Steel Site would require the addition of a permanent access road (approximately 3,600 feet long by 12 feet wide), which would result in linear visual disturbance on hillsides visible from SR-33. However, as stated above, the presence of oil and gas infrastructure in the nearby SR-33 viewshed would reduce the severity of visual character effects. It

should be noted that although the Ventura Steel Site is adjacent to North Ventura Avenue, both the site and this segment of Ventura Avenue are north of the scenic corridor boundaries as identified by the City (City of Ventura 2005~~b~~). Lastly, the Ventura Steel Site is not anticipated to be visible from Grant Park due to the presence of an intervening ridgeline that effectively blocks the site from the view of Grant Park visitors.

Land Use and Planning

The Ventura Steel Site is located within the County of Ventura, approximately 0.31 miles north of the City of Ventura boundary and within the City's spere of influence (City of Ventura 2022~~a~~b, 2022~~b~~c), slightly west of SR-33. The Ventura Steel Site's on-site components would be located across portions of several APNs, including APN 063-0-210-12 (8.77 acres), APN 063-0-220-14 (3.46 acres), APN 063-0-220-15 (1.49 acres), APN 063-0-220-16 (1.68 acres), and a slim portion of APN 063-0-210-09 (County of Ventura 2021). Under existing conditions, regional access to the site is provided by Ventura Avenue via SR-33 and U.S. Route 101.

Land uses adjacent to the Ventura Steel Site include the County General Plan land use designations of Industrial to the north, west, and south, as well as Open Space directly adjacent and to the east. The adjacent land areas to the north, west, and south are zoned M-3 (General Industrial Zone with a 10,000-square-foot lot area minimum), per the County non-coastal zoning ordinance (County of Ventura 2023, 2021). The parcel adjacent to the southeast corner of the site is zoned OS-160, requiring a minimum lot area of 160 acres, and an additional parcel located approximately 78 feet to the east of this parcel is zoned AE-40, which has a minimum lot size requirement of 40 acres (County of Ventura 2023). The Ventura Steel Site is not adjacent to any sensitive receptors. The nearest sensitive land use is a residentially zoned parcel (APN 069-0-151-105) in the City of Ventura, approximately 0.33 miles to the south of the site boundary.

The Ventura Steel Site's on-site operational components would be located across portions of several APNS within the County. The current County land use and zoning for the compressor station site are Industrial and M-3, which has a 10,000-square-foot lot area minimum. The Ventura Steel Site Alternative would require more than 19,000 feet of additional pipeline. There are two main pipeline corridors proposed: one would be located primarily in the public right-of-way along Ventura Avenue, connecting to an existing pipeline on the existing compressor station site (City of Ventura 2022~~a~~b, 2022~~b~~c), and the other would be located east of the City's urban area skirting the City/County boundary line. This corridor would travel through County parcels with a land use designation of Open Space, as well as a City parcel with a land use designation of Neighborhood Low (County of Ventura 2020; City of Ventura 2005). Zoning for these parcels includes Residential Planned Development (RPD) (City), OS-160 (County), AE-40 (County), and M-3 (County). Because the compressor station site would be located on land areas designated for industrial and/or manufacturing uses, selection of this alternative would be a permitted use with existing land use and/or zoning. Additionally, the proposed Ventura Steel Staging Area would be spread across multiple parcels to the northeast of the compressor station site, all of which are similarly designated Industrial and zoned M-3; however, the Ventura Steel Staging Area would be removed once the site becomes operational and is therefore not incorporated into the operational land use analysis.

7 Cumulative and Other CEQA Considerations

7.1.3.8 Greenhouse Gas Emissions

7.9d) Would the project be located on a site that 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?

Not Cumulatively Considerable. The Project Site is listed twice on the List of Leaking Underground Storage Tank Sites by the State Water Resources Control Board (SWRCB 2023~~a~~). These storage tanks, however, have been removed and their impacts have been remediated. These cases have both received closure from the Ventura County Environmental Health Division. Further, the remediation of contaminated soils on the Project Site in accordance with the RAW will be completed prior to the commencement of any Project-related construction activities on the Project Site. Therefore, the Project would avoid the creation of a significant hazard to the public or the environment and would not contribute to potential cumulative impacts related significant hazards associated with contaminated sites on a list compiled in accordance with Government Code Section 65962.5.

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Appendix A

Detailed Maps and Design Drawings (additional GIS files provided separately)

Appendix B

Air Quality and GHG Emissions Technical Report

Appendix C
Biological Resources Assessment

Appendix H

Preliminary Construction Fire Prevention Plan

Appendix O

Preliminary Emergency Action and Fire Prevention Plan and Preliminary Health and Safety Plan

Appendix Q

Pipeline Repair/Replacement and Inspection

–CONFIDENTIAL–

Appendix R

Preliminary Traffic Plan and Control