
Attachment 1
Avocado Site Response

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT

(A.23-08-019)

SOCALGAS

CPUC – CEQA AND ENERGY PERMITTING

(Data Request 001)

DATE REQUESTED: January 21, 2025

RESPONSE SUBMITTED: October 17, 2025

The following questions pertain to the three site alternatives to the proposed Ventura Compressor Station Modernization Project (VCM Project) considered in the Proponent's Environmental Assessment (PEA) Section 6, Comparison of Alternatives.

The three site alternatives identified by SoCalGas® are as follows:

- Avocado Site
- Devil's Canyon Road Site
- Ventura Steel Site

The responses within this attachment address the Avocado Site only. Please refer to Attachment 2 for responses related to the Devil's Canyon Road Site and Attachment 3 for responses related to the Ventura Steel Site.

SoCalGas's General Approach for Avocado Site Alternative

SoCalGas's proposed approach included the following steps to respond to this data request and perform the required preliminary engineering design and environmental assessment:

- Developing the responses and designs using insights derived exclusively from desktop-level analysis.
- Utilizing publicly available information from city, county, and state records.
- Using geographic information system (GIS) software to generate data reports that may include information such as potential utility conflicts, geotechnical information, constructability, and pipeline routing options to and from each alternative site.
- Taking photos from publicly accessible areas or from land with SoCalGas access rights to assess site conditions.¹
- Using engineering data from previous Front End Engineering Design (FEED), which is not anticipated to change at the three site alternatives and includes the compressor building, office and warehouse building and perimeter fencing security features. Any additional preliminary engineering developed to address this data request is approximately at a 5 percent engineering level, while the VCM Project has been developed at an approximately 15 percent engineering level.

¹ No actual aerial or field survey was performed for alternative sites for both on-site and off site infrastructure since SoCalGas does not own any of the proposed alternative sites and would require property owners/operators to provide access to their property. Likewise, Ground-Penetrating Radar (GPR) surveys have not been performed to locate existing underground utilities, pipes, and other potential obstructions at the alternative sites for both on-site and off-site infrastructure.

- Assuming the Commission preempts local zoning regulations, ordinances, codes, and requirements, and that any such discretionary permits that would otherwise be required to implement the project are preempted.

All identified features and proposed infrastructure presented in engineering drawings will be subject to validation in the subsequent phases of the project, once a final decision is made by the California Public Utilities Commission (CPUC). Using preliminary engineering design, SoCalGas has provided the information requested on the environmental conditions to support the comparative analysis of the potential effects for each alternative.

1.1 General Information About Site Alternatives

Please provide PEA-level information for each of the three site alternatives.

The Avocado Site is located 3,000 feet west of the existing Ventura Compressor Station property on the existing gas transmission pipeline corridor. The Avocado Site itself is undeveloped hillside terrain adjacent to an avocado orchard and would require substantial grading to be suitable for development.²

The Avocado Site is remote, and access to the site is through an existing unpaved agricultural road that would require widening, re-grading, and paving to meet Ventura County Fire Department standards. It is assumed that no utility connections are available, such as access to the existing City of Ventura (City) water main and sewer lines. The nearest electrical interconnection is through an existing Southern California Edison (SCE) Grandad 16 kilovolt circuit.

The Avocado Site Alternative consists of (1) installing two new 1,900 horsepower (HP) natural gas compressors and two new 2,500 nominal HP electric compressors, (2) erecting a new 10,458-square-foot compressor building; (3) erecting a new 4,641-square-foot permanent office building; (4) erecting a new 5,459-square-foot warehouse; (5) installing a new 8-foot-tall perimeter block wall; (6) installing new gas pipeline system that would tie into the existing natural gas system pipelines; (7) installing new water and sewer lines beneath Taylor Ranch Road that would tie into existing facilities at West Main Street; and (8) installing aboveground approximately 17 new electrical poles from the existing SCE Grandad circuit to connect on site to the proposed compressor station.

The Avocado Site Alternative would require substantial site preparation and infrastructure development to meet operational requirements.

² The underlying land use of the Avocado Site is included in the County's Measure C Save Open-Space and Agricultural Resources Initiative—2050 (SOAR), which states that "lands designated as Agricultural, Rural, or Open Space on the County of Ventura's General Plan will remain so designated until December 31, 2050 unless the land is redesignated ... by vote of the people or redesignated by the Board of Supervisors for the County of Ventura" (<https://www.soarvc.org/communities/ventura-county/>).

For each of the site alternatives, please provide additional details and maps identifying the necessary site features and off-site infrastructure, as follows (see Responses to Sections 1.1.1–1.1.4):

1.1.1 Permanent and temporary disturbance area boundaries, and any extra work areas (e.g., staging or parking areas), identified with GIS data and maps, consistent with PEA Checklist requirements.

RESPONSE

The permanent disturbance area for both on-site and off-site infrastructure is about 97 acres. The temporary disturbance area, which applies only to off-site infrastructure, is about 7 acres. These values are approximations based on conceptual engineering and would need to be validated and updated in later phases of design.

The permanent and temporary disturbance area boundaries can be viewed on Avocado Site Drawing 152084-7007-D-SKT, Conceptual Limits of Disturbance, or using the Limits of Disturbance KMZ/GIS Files. The Conceptual Limits of Disturbance drawing outlines the boundaries of both permanent and temporary disturbance areas. Permanent disturbance areas, shown in blue on the drawing, encompass grading for the project site and associated off-site infrastructure, including gas pipelines, water line, wastewater line, electrical interconnect, and access road. Temporary disturbance areas, shown in green on the drawing, represent construction staging areas and personnel parking areas.

Please refer to Appendix 1-A for a PDF of Avocado Site Drawing 152084-7007-D-SKT, showing the Conceptual Limits of Disturbance, and Attachment 1-A for the associated KMZ and SHP files.

1.1.2 Electric interconnections and modifications to existing electric distribution facilities.

RESPONSE

The proposed facility on the Avocado Site would receive power from the existing SCE Grandad circuit and is based on a preliminary study conducted by SCE. Using this study, a preliminary route was developed that entails the installation of approximately 17 new electrical poles and a 4,400-foot alignment along Taylor Ranch Road to deliver power to the Avocado Site. Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, shows the proposed electrical interconnect alignment, pole types, and assumed tie-in location to the existing Grandad circuit. Avocado Site Drawing 152084-5520-D-SKT, Electrical Distribution Interconnect Preliminary Details, shows details of each pole type, pole anchor and hole depths, and pole limit of disturbance. Avocado Site Drawing 152084-3001-D-SKT, Conceptual Plot Plan, shows the on-site connection point for the electrical line to the switchgear and metering panel.

Based on the preliminary SCE Engineering Analysis Report (Appendix 1-B), SCE is currently progressing on making substation upgrades to the existing electrical system to improve reliability and at this time, SCE does not anticipate any modifications to its distribution system to serve the requested load at the Avocado Site.

Please refer to Appendix 1-A for Avocado Site Drawings 152084-7004-D-SKT, 152084-5520-D-SKT, and 152084-3001-D-SKT, the Conceptual Pipeline & Utility Plan, Electrical Distribution Interconnect Preliminary Details, and Conceptual Plot Plan, respectively. Refer to Appendix 1-B for the electrical interconnections detailed in the SCE Engineering Analysis Report for the Avocado Site.

1.1.3 Natural gas transmission system pipeline modifications.

RESPONSE

The proposed facility on the Avocado Site would require new natural gas transmission pipelines. Two pipeline systems, consisting of 20-inch-diameter suction and 20-inch-diameter discharge lines on each pipeline, would be constructed to tie the Avocado Site in to existing natural gas transmission pipelines (L-1005 and L-1004) totaling 3,200 feet of newly installed transmission pipeline. Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, shows the pipeline alignment and transmission line tie-in locations. Avocado Site Drawing 152084-7732-D-SKT, Two Gas Pipelines Corridor Detail sheet, shows a section cut of a typical two-gas-pipeline trench, including bedding, backfill, and surface recommendations.

Please refer to Appendix 1-A for Drawings 152084-7004-D-SKT and 152084-7732-D-SKT, which detail the natural gas transmission system pipeline modifications for the Avocado Site.

1.1.4 Other utilities, such as water and wastewater.

RESPONSE

The Avocado Site is a remote greenfield site and is assumed to not be connected to existing City water mains. The closest water main to the site is located near West Main Street, which is approximately 12,000 feet away. The site elevation is approximately 650 feet higher than the existing City water main and may result in insufficient water pressure needed for fire protection. Therefore, a water storage tank that provides sufficient volume for fire protection requirements would be constructed. Filling this tank and providing potable water to the site would require the construction of a private 6-inch-diameter, 12,000-foot-long, high-pressure water transmission pipeline from a municipal main. Additional site investigation will be needed to confirm the tie-in location to the public water system. An off-site water pump house would be constructed within the project limits of disturbance to meet the flow and pressure requirements for the site. Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, shows the waterline alignment, proposed pump house location, and tie-in location. Avocado Site Drawing 152084-7131-D-SKT, details 1 and 4, Conceptual Road & Utility Trench Details sheet, shows the pump house general arrangement and a section cut of a typical water trench detail, including bedding, backfill, and surface recommendations.

The Avocado Site is remote and is not close to existing City sewer lines. Due to the elevation difference between the site and existing public sewer mains, constructing a standard gravity sewer extension is impractical. Therefore, a wastewater grinder pump system would be installed within the facility boundary to manage the disposal of wastewater into the public sewer system. An anticipated 1-inch-diameter, 12,000-foot-long wastewater line would be routed along the

access road to an existing sewer main along West Main Street. Additional site investigation will be needed to confirm the tie-in location to the public sewer system. Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, shows the wastewater line alignment and proposed tie-in location. Avocado Site Drawing 152084-7131-D-SKT, detail 2 Conceptual Road & Utility Trench Details sheet shows a section cut of a typical wastewater line trench detail, including bedding, backfill, and surface recommendations.

Please refer to Appendix 1-A for Avocado Site Drawings 152084-7004-D-SKT and 152084-7131-D-SKT, which detail the utilities plan for the Avocado Site.

1.1.5 Access road improvements, including paving.

RESPONSE

The Avocado Site is remote, and access to the site is currently an existing unpaved agricultural road. The existing access road would require grading and widening from one lane to two lanes to meet Ventura County Fire Department standards. The road would be 24 feet wide and approximately 12,800 feet long. The widening of the existing access road would impact the adjacent avocado groves in some areas. Avocado Site Drawing 152084-7001-D-SKT, Conceptual Overall Surfacing Plan, shows the access road improvements and limits of proposed grading required for those road improvements. Avocado Site Drawing 152084-7131-D-SKT, detail 3, Conceptual Road & Utility Trench Details, shows a typical road section cut.

Please refer to Appendix 1-A for Avocado Site Drawings 152084-7001-D-SKT and 152084-7131-D-SKT, which provide site paving details for the Avocado Site.

For each of the site alternatives, please confirm whether the following proposed “site improvements” would need to be included (see Responses to Sections 1.1.6–1.1.11):

1.1.6 Power Distribution Center (PDC) Building (1,500 square feet).

RESPONSE

The PDC building would need to be included in the facility at the Avocado Site. As it would for the VCM Project, the PDC building would serve as the center for receiving electrical power from the SCE feed and would distribute it to various equipment that is part of the project. The electrical load at the Avocado Site is anticipated to be similar to the VCM Project. Based on the preliminary layouts and the available information, a 1,500-square-foot PDC building would be needed to meet the Avocado Site Alternative’s requirements. Avocado Site Drawing 152084-3001-D-SKT, Conceptual Plot Plan, shows the location of the PDC building within the facility boundary.

The Avocado Site would include the site improvement listed above. Please refer to Appendix 1-A for Avocado Site Drawing 152084-3001-D-SKT, which provides the Conceptual Plot Plan for the Avocado Site improvements.

1.1.7 Office building and warehouse.

RESPONSE

The office building and warehouse would both need to be included in the facility at the Avocado Site. Similar to the VCM Project, a new office building for on-site employees and a new warehouse would be constructed to support the operation of the facility. The office building and warehouse would be the same size and height as in the VCM Project. Avocado Site Drawing 152084-3001-D-SKT, Conceptual Plot Plan, shows the location of the office building and warehouse.

The Avocado Site would include the site improvement listed above. Please refer to Appendix 1-A for Avocado Site Drawing 152084-3001-D-SKT, which provides the Conceptual Plot Plan for the Avocado Site improvements.

1.1.8 Standby generator with enclosure.

RESPONSE

The standby generator with an enclosure would need to be included in the facility at the Avocado Site. The proposed natural gas standby generator at the Avocado Site would be the same size and equipment model as the VCM Project (see Response to Section 1.3.2 below). There are, however, minor differences between the Avocado Site Alternative and the VCM Project, such as the addition of a fire water pump at the Avocado Site. This is not significant; therefore, this would not change the size of the proposed standby generator. Avocado Site Drawing 152084-3001-D-SKT, Conceptual Plot Plan, shows the location of the standby generator inside the facility.

The Avocado Site would include the site improvement listed above. Please refer to Appendix 1-A for Avocado Site Drawing 152084-3001-D-SKT, which provides the Conceptual Plot Plan for the Avocado Site improvements.

1.1.9 New storage tanks.

RESPONSE

The storage tanks in the VCM Project would also need to be included in the facility at the Avocado Site, in addition to a new fire water storage tank. The storage tanks required for the facility at the Avocado Site include an oily waste storage drum, an engine oil storage drum, a waste oil storage drum, a condensate drip drum, a coolant storage drum, a compressor area oil waste tank, and a new fire water storage tank. Avocado Site Drawing 152084-3001-D-SKT, Conceptual Plot Plan, shows the location of each of these tanks inside the facility. The new fire water storage tank is a change from the VCM Project because adequate water supply and water pressure are not readily available to meet the fire protection needs at the Avocado Site. Additional engineering in future phases of design will be required to validate the tank size.

The Avocado Site would include the site improvement listed above. Please refer to Appendix 1-A for Avocado Site Drawing 152084-3001-D-SKT, which provides the Conceptual Plot Plan for the Avocado Site improvements.

1.1.10 Perimeter fencing, gate, and security features.

RESPONSE

The perimeter fencing, gate, and security features would be included in the facility at the Avocado Site. The entire site would be surrounded by an 8-foot-tall masonry security wall. The site would have a 30-foot-wide sliding metal gate with a card reader on the southeast corner of the site for primary vehicle access and a separate metal gate for pedestrian access. Another 15-foot-wide sliding metal gate would be installed on the east side of the south wall for additional access as needed. Avocado Site Drawing 152084-3001-D-SKT, Conceptual Plot Plan, shows the location of the security wall, site access gates, and security features.

The Avocado Site would include the site improvement listed above. Please refer to Appendix 1-A for Avocado Site Drawing 152084-3001-D-SKT, which provides the Conceptual Plot Plan for the Avocado Site improvements.

1.1.11 Site paving.

RESPONSE

The Avocado Site would require finished grading and site paving, including areas requiring asphalt or aggregate surfacing. The Avocado Site is a greenfield site, and it is assumed that no demolition of existing structures or pavement is required. However, extensive earthwork will be required to grade the Avocado Site, which may include removal of vegetation and portions of the existing avocado orchards. Avocado Site Drawing 152084-7002-D-SKT, Conceptual Site Surfacing Plan, shows the site surfacing features that are included.

The Avocado Site would include the site improvement listed above. Please refer to Appendix 1-A for Avocado Site Drawing 152084-7002-D-SKT, which details the site surfacing plan for the Avocado Site.

Please confirm where construction details for the site alternatives would be likely to differ from the VCM Project; for example:

1.1.12 Please provide a list of anticipated construction equipment required for each site alternative (including type and quantity) and number of hours to be operated.

RESPONSE

The construction of the Avocado Site would include the additional phases and equipment that are highlighted in grey in Table 1-1 below. The construction of the Avocado Site would not include Phase 2, Existing Project Site Demolition, which was included for the VCM Project. In addition, Phase 3 for the Avocado Site construction includes additional equipment when compared to the VCM Project due to the large amount of grading and earthwork required at the site as well as off-site infrastructure construction. All remaining phases would be the same as the VCM Project.

Information provided in this response was obtained from the Air Quality and Greenhouse Gas Emissions Analysis of Avocado Site (Appendix 1-C).

TABLE 1-1
Avocado Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
A1	Site Assessment (Site Preparation)	Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37
A2	Soil Remediation (Site Preparation)	Excavators	346	1	Diesel	[8]	0.38
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Generator Sets	49	1	Diesel	[8]	0.74
A3	Gas Pipeline Installation (Building Construction)	Excavators	346	1	Diesel	[8]	0.38
		Rubber-Tired Dozers	363	1	Diesel	[8]	0.4
		Other Construction Equipment	319	2	Diesel	[8]	0.42
		Other Construction Equipment	109	1	Diesel	[8]	0.42
		Welders	24	3	Diesel	[8]	0.45
		Graders	250	1	Diesel	[8]	0.41
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	74	1	Diesel	[7]	0.37
A4	Electrical Interconnect (Building Construction)	Air Compressors	10	2	Diesel	[6]	0.48
		Forklifts	82	1	Diesel	[8]	0.2
		Generator Sets	49	2	Diesel	[8]	0.74
1	Off site Laydown Development + Facility Clearing, Grubbing, Initial Site Excavation (Site Preparation)	Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Graders	250	1	Diesel	[8]	0.41
		Rubber-Tired Dozers	363	1	Diesel	[8]	0.4
		Rollers	125	1	Diesel	[8]	0.38
		Excavators	346	1	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	74	1	Diesel	[7]	0.37

TABLE 1-1
Avocado Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
2	Road Widening & Utilities (Building Construction)	Off-Highway Trucks	500	2	Diesel	(8)	0.29
		Excavators	346	2	Diesel	[8]	0.38
		Rubber-Tired Dozers	363	1	Diesel	[8]	0.4
		Graders	250	1	Diesel	[8]	0.41
		Rollers	125	2	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	74	1	Diesel	[7]	0.37
		Plate Compactors	249	1	Diesel	[8]	0.43
		Pavers	173	1	Diesel	[8]	0.42
		Scrapers	570	6	Diesel	[8]	0.48
3	Mass Excavation and Cut Disposal (Trenching)	Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37
		Excavators	45	1	Diesel	[8]	0.38
		Air Compressors	49	1	Diesel	[6]	0.48
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	180	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Rubber-Tired Dozers	125	1	Diesel	[8]	0.4
		Plate Compactors	249	1	Diesel	[8]	0.43
		Rollers	125	1	Diesel	[8]	0.38
		Excavators	346	2	Diesel	[8]	0.38
		Air Compressors	10	1	Diesel	[6]	0.48
4	Foundations (Building Construction)	Cranes	275	1	Diesel	[7]	0.29
		Excavators	45	1	Diesel	[8]	0.38
		Excavators	346	1	Diesel	[8]	0.38
		Forklifts	74	1	Diesel	[8]	0.2
		Forklifts	[82]	1	Electric	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Off-Highway Trucks	500	1	Diesel	(8)	0.38

TABLE 1-1
Avocado Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
		Rubber-Tired Dozers	170	1	Diesel	[8]	0.4
		Tractors/Loaders/Backhoes	225	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37
		Welders	24	2	Diesel	[8]	0.45
5	Trenching/ Undergrounds (Trenching)	Pumps ^e	[11]	2	Diesel	[8]	0.74
		Excavators	45	1	Diesel	[8]	0.38
6	Equipment, Structural Steel & Building Erection, Piping	Aerial Lifts	67	1	Diesel	(8)	0.31
		Aerial Lifts	[46]	5	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Air Compressors	10	1	Diesel	[6]	0.48
		Cranes	200	1	Diesel	[7]	0.29
		Cranes	275	2	Diesel	[7]	0.29
		Excavators	45	1	Diesel	[8]	0.38
		Forklifts	[82]	1	Electric	[8]	0.2
		Forklifts	122	1	Diesel	[8]	0.2
		Forklifts	74	1	Diesel	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	225	2	Diesel	[7]	0.37
		Welders	24	2	Diesel	[8]	0.45
		Welders	[46]	5	Electric	[8]	0.45
7	Electrical & Instrumentation (Building Construction)	Aerial Lifts	[46]	4	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Air Compressors	10	2	Diesel	[6]	0.48
		Cranes	200	1	Diesel	[7]	0.29
		Cranes	275	2	Diesel	[7]	0.29
		Forklifts	[82]	1	Electric	[8]	0.2

TABLE 1-1
Avocado Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
		Forklifts	74	1	Diesel	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	225	2	Diesel	[7]	0.37
		Welders	[46]	5	Electric	[8]	0.45
		Welders	24	2	Diesel	[8]	0.45
8	Paving (Paving)	Rollers	125	1	Diesel	[8]	0.38
9	Painting/Insulation (Architectural Coating)	Air Compressors	10	1	Diesel	[6]	0.48
		Generator Sets	49	1	Diesel	[8]	0.74
10	Commissioning/Startup and Testing (Building Construction)	Aerial Lifts	[46]	4	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Cranes	275	1	Diesel	[7]	0.29
		Forklifts	74	1	Diesel	[8]	0.2
		Forklifts	[82]	1	Electric	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Tractors/Loaders/Backhoes	225	2	Diesel	[7]	0.37
		Welders	[46]	3	Electric	[8]	0.45
		Welders	24	2	Diesel	[8]	0.45
12	Decommissioning / Demolition (Demolition)	Concrete/Industrial Saws	33	1	Diesel	[8]	0.73
		Excavators	45	1	Diesel	[8]	0.38
		Aerial Lifts	[46]	4	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Cranes	275	1	Diesel	[7]	0.29
		Forklifts	74	1	Diesel	[8]	0.2
		Forklifts	[82]	1	Electric	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Tractors/Loaders/Backhoes	225	2	Diesel	[8]	0.37
		Welders	[46]	3	Electric	[8]	0.45

TABLE 1-1
Avocado Site Off-Road Construction Equipment

Phase Name	Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
	Welders	24	2	Diesel	[8]	0.45

Notes: HP = horsepower.

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

^a Engine horsepower ratings in brackets are CalEEMod default values (Version 2022.1.1.30).

^b All diesel engines are assumed to be U.S. Environmental Protection Agency Tier 4 Final and electric engines have an average electric mix.

^c Construction hours per day in brackets are CalEEMod default values. A value of 8 hours per day is used for equipment for which there are no project-specific or CalEEMod default values (i.e., Bore/Drill Rigs, Off-Highway Trucks, Skid Steer Loaders, and Aerial Lifts), and is shown in parentheses.

^d Engine load factors are CalEEMod default values (Version 2022.1.1.30).

^e Pumps are conservatively modeled as diesel units in Phase 5 rather than as electric units in Phase 4 as planned for construction.

1.1.13 Please identify where the equipment type, quantity, hours to be operated, and/or construction phasing may differ for site alternatives when compared with the Project. Include a construction schedule for each site alternative.

RESPONSE

The construction of the Avocado Site would include the additional phases that are highlighted in grey in Table 1-2 below. The construction of the Avocado Site would not include Phase 2, Existing Project Site Demolition, which was included for the VCM Project. In addition, Phase 3 for the Avocado Site construction will require a greater number of workdays compared to the VCM Project due to the large amount of grading and earthwork required at the site as well as off-site infrastructure construction. All remaining phases would be the same as the VCM Project.

Information provided in this response was obtained from the Air Quality and Greenhouse Gas Emissions Analysis of Avocado Site (Appendix 1-C).

TABLE 1-2
Avocado Site Preliminary Construction Schedule

Phase Number	Phase Description	Phase Start Date	Phase End Date	Workdays per Phase
A1	Site Assessment	7/3/2034	7/8/2034	4
A2	Soil Remediation	7/2/2035	7/30/2035	21
A3	Gas Pipeline Installation	7/2/2035	7/30/2035	21
A4	Electrical Interconnect	1/30/2036	3/31/2036	44
1	Off site Laydown Development & Facility Clearing, Grubbing, Initial Site Excavation	7/2/2035	8/30/2035	44

TABLE 1-2
Avocado Site Preliminary Construction Schedule

Phase Number	Phase Description	Phase Start Date	Phase End Date	Workdays per Phase
2	Road Widening & Utilities	8/31/2035	6/11/2036	204
3	Mass Excavation and Cut Disposal	6/12/2036	1/20/2037	159
4	Foundations	1/21/2037	9/16/2037	171
5	Trenching/Undergrounds	8/17/2037	11/4/2037	58
6	Equipment, Structural Steel & Building Erection, Piping	5/22/2037	3/29/2038	222
7	Electrical & Instrumentation	2/26/2038	1/12/2039	229
8	Paving	1/13/2039	3/14/2039	43
9	Painting/Insulation	2/11/2039	4/11/2039	42
10	Commissioning/Startup and Testing	1/13/2039	6/21/2039	114
11 ^a	Post Construction/Site Restoration	6/22/2039	7/21/2039	22
12 ^b	Decommissioning/Demolition	6/21/2040	9/24/2040	68

Notes:

- No offroad equipment is expected to be used for Phase 11; however, approximately 50 percent of equipment hauling for demobilization will be taking place during Phase 11.
- Decommissioning/Demolition is assumed to be completed approximately one year after the new replacement compressors are fully operational and would involve removal of the existing compressors at the current site.

1.1.14 Please provide approximate quantities of material imports and exports at each alternative site.

RESPONSE

Table 1-3 below summarizes the estimated quantities of imported and exported materials for the Avocado Site, considering both on-site (facility and foundations) and off-site (pipeline, waterline, wastewater, electrical, road) infrastructure.

TABLE 1-3
Estimated Quantities of Imported and Exported Materials for the Avocado Site Alternative

	Fill Quantity (CY)	Excavated Quantity (CY)	Import (CY)	Export (CY)
On site (Facility, Foundations)	586,570	1,057,355	N/A	470,785
Off site (Pipeline, Road, Waterline, Sewer, Electrical)	210,353	60,003	153,735	N/A
Soil Remediation – Off site	N/A	3,085	0	3,085
Total Import/Export			153,735	473,870

Notes: CY = cubic yards; N/A = not applicable.

Excess excavated materials from the facility earthworks will be utilized as fill for off-site soil remediation (pesticides or hydrocarbons).

These figures are preliminary estimates and will require validation and updates during subsequent design phases. The calculations assume that all excavated material is suitable for fill and do not account for changes in soil density between excavation and recompaction.

On-site construction requires approximately 1,057,355 cubic yards of excavation and approximately 586,570 cubic yards of fill. Using all on-site excavated material for on-site fill leaves approximately 470,785 cubic yards for export.

Off-site infrastructure requires approximately 60,003 cubic yards of excavation and approximately 210,353 cubic yards of fill.

It is estimated that approximately 3,085 cubic yards of shallow soil in the southernmost portion of the proposed roadway/utility corridor are potentially impacted with organochlorine pesticide and petroleum hydrocarbons and would need to be managed accordingly during earthwork (Appendix 1-D, Desktop Hazards Assessment for VCM Project – Avocado Site, Section 9.2). Based on the Desktop Hazards Assessment, no anticipated soil impacts were identified within the proposed compressor area for the Avocado Site Alternative. A total of approximately 153,735 cubic yards of soil will need to be imported for the off-site infrastructure, which will come from the on-site excavation.

The excess material from the on-site excavation work (approximately 470,785 cubic yards) can be used to fulfill the off-site fill requirement, resulting in a net zero import of soil for the entire Avocado Site. This leaves a total of approximately 320,135 cubic yards (473,870 cubic yards – 153,735 cubic yards) for export.

Please refer to Appendix 1-D, Desktop Hazards Assessment for VCM Project – Avocado Site, for relevant earthwork details and potential for contaminated soils.

1.1.15 Please specify the number of construction phase employees, water truck delivery trips, and haul trips that may differ for each alternative site when compared with the Project.

RESPONSE

The construction of the Avocado Site would include additional phases of construction compared to the VCM Project, which would require additional construction workers and vendors. This additional information is highlighted in grey in Table 1-4 below. The construction of the Avocado Site would not include Phase 2, Existing Project Site Demolition, which was included for the VCM Project. In addition, Phase 3 for the Avocado Site construction will require a greater number of workers and vendors compared to the VCM Project due to the large amount of grading and earthwork required at the site.

Information provided in this response was obtained from the Air Quality and Greenhouse Gas Emissions Analysis of Avocado Site (Appendix 1-C).

TABLE 1-4
Avocado Site Alternative Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
A1	Site Assessment	Worker	6	10	LDA, LDT1, LDT2
		Vendor	4	10	HHDT, MHDT
A2	Soil Remediation	Worker	20	46	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	8	10	HHDT
A3	Gas Pipeline Installation	Worker	27	10	LDA, LDT1, LDT2
		Vendor	2	10	HHDT, MHDT
		Hauling	8	42	HHDT
A4	Electrical Interconnect	Worker	27	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	5	43	HHDT
1	Off site Laydown Development & Facility Clearing, Grubbing, Initial Site Excavation	Worker	35	10	LDA, LDT1, LDT2
		Vendor	8	10	HHDT, MHDT
		Hauling	11	45	HHDT
2	Road Widening & Utilities	Worker	68	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT
		Hauling	37	46	HHDT
3	Mass Excavation and Cut Disposal	Worker	45	10	LDA, LDT1, LDT2
		Vendor	24	10	HHDT, MHDT
		Hauling	68	46	HHDT
4	Foundations	Worker	68	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	10	41	HHDT
5	Trenching/ Undergrounds	Worker	46	10	LDA, LDT1, LDT2
		Vendor	2	10	HHDT, MHDT
		Hauling	9	41	HHDT
6	Equipment, Structural Steel & Building Erection, Piping	Worker	78	10	LDA, LDT1, LDT2
		Vendor	22	10	HHDT, MHDT
		Hauling	1	41 (295)	HHDT
7	Electrical & Instrumentation	Worker	36	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT

TABLE 1-4
Avocado Site Alternative Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
		Hauling	1	41	HHDT
8	Paving	Worker	22	10	LDA, LDT1, LDT2
		Hauling	12	41	HHDT
9	Painting/Insulation	Worker	4	10	LDA, LDT1, LDT2
		Hauling	9	41	HHDT
10	Commissioning/ Startup and Testing	Worker	28	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT
		Hauling	3	41	HHDT
11	Post Construction/Site Restoration	Hauling	14	41	HHDT
12	Decommissioning/ Demolition	Worker	28	10	LDA, LDT1, LDT2
		Vendor	18	10	HHDT, MHDT
		Hauling	3	20	HHDT

Notes:

- Vehicle Mix: LDA = Light Duty Automobile; LDT1 = Light Duty Trucks up to 3,750 lb loaded vehicle weight (LVW); LDT2 = Light Duty Trucks 3,750–8,500 lb LVW; MHDT = Medium Heavy-Duty Trucks (8,500–14,000 lb); HHDT = Heavy Heavy-Duty Trucks (>14,000 lb).
- Hauling trip mileages for Equipment, Structural Steel & Building Erection, and Piping phase (Phase 6) are average one-way distances from the Avocado Site to 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 Avocado Site to the Arizona State Line used to estimate GHG emissions.
- For phases involving both hauling of material from the site to landfill (~46 miles) and delivery of equipment to the site (~41 miles), since only one hauling entry is allowed per phase in CalEEMod, the haul distances were calculated using a weighted average. For example, for phase A3, which includes 2 trips to the landfill and 6 equipment delivery trips, the total of 8 trips was entered with a weighted average distance of 42 miles.
- Hauling trip mileage for Phase 12 (i.e., Decommissioning/Demolition) is CalEEMod default.

1.1.16 Please provide a description of any anticipated earthwork at the site, construction staging yards, and for associated infrastructure such as access roads, gas supply pipelines, and other utilities such as electrical or water, including (but not limited to): acres of grading with anticipated volumes of cut and fill for the site and construction staging yard; grading for access roads; and excavation widths and depths for poles, utilities, and foundations.

RESPONSE

The following paragraphs describe the construction activities that would have associated earthwork quantities for the Avocado Site.

Site Elevation Cut and Fill Balancing

In terms of earthwork at the Avocado Site, a significant amount of excavation would be required due to the nature of the topography compared to the VCM Project. To establish the minimum 8-acre requirement to build a new compressor station, the total estimated disturbed acreage for the Avocado Site is under 40 acres using a 2:1 slope for cut and fill. A 2:1 slope is typically required to meet acceptable engineering design standards and a steeper slope will require justification through a soil geotechnical report. Based upon the preliminary assessment and during the next design phase, it is anticipated that the final slope can be steeper than 2:1, which would reduce the disturbance acreage. Soil in the southernmost portion of the proposed roadway/utility corridor has been impacted by the historical and ongoing use of the site for agricultural uses; therefore, the necessity for remediation of soil in this area is anticipated (refer to the Desktop Hazards Assessment for VCM Project – Avocado Site, Section 9.1, in Appendix 1-D).

Temporary Staging Area

The VCM Project and the Avocado Site both have temporary construction staging areas; however, the Avocado Site is approximately 2.27 miles away from its staging area due to its remote location. It is located at the intersection of Taylor Ranch Road and West Main Street.

Access Road to the Site

The Avocado Site requires an extensive widening of the Taylor Ranch Road, which is estimated to take 8.5 months prior to the development of the site. In contrast, the VCM Project does not require any road improvements. The earthwork on the access road would consist of Stormwater Pollution Prevention Plan (SWPPP) implementation, clearing and grubbing, fill preparation, cut to fill, import of backfill material, compacting, finish subgrade, and asphalt paving.

Natural Gas Transmission Pipelines

The Avocado Site requires additional gas supply and discharge pipelines that the VCM Project does not require. The earthwork would consist of trenching, bedding, installation of piping, backfill, and compaction.

Southern California Edison (SCE) Electrical Interconnection

The Avocado Site would receive power from the existing SCE Grandad circuit. To connect to this circuit, 17 new poles would be installed along 4,400 feet of Taylor Ranch Road to deliver power to the Avocado Site. The earthwork would consist of route clearing, use of a pole truck to auger and set poles, and cleanup of any remaining spoils.

Water and Sewer

The Avocado Site would require the installation of new water line and wastewater line. It is assumed the connection points to the public water and sewer systems are located along West Main Street at the base of Taylor Ranch Road. There would also be a water pump station

at the water connection point to provide the necessary pressure to get water to the on-site storage tank.

Earthwork

The earthwork would consist of SWPPP implementation, clearing and grubbing, and cut-to-fill leveling; the remaining work would be consistent with the VCM Project. The anticipated earthwork volumes are summarized in Table 1-5.

Please refer to Appendix 1-D, Desktop Hazards Assessment for VCM Project – Avocado Site, for information on the anticipated soil remediation due to agricultural use of the Avocado Site.

TABLE 1-5
Anticipated Earthwork Volumes

Item No.	Description	Volume (CY) Avocado Site	Volume (CY) VCM Project Site
1	Site Excavation	1,040,000	1,907
2	Site Fill	575,000	3,400
3	Roadway Excavation	50,217	0*
4	Roadway Fill	203,335	0*
5	Wastewater Line Excavation	893	0*
6	Wastewater Line Bedding	179	0*
7	Wastewater Line Backfill	714	0*
8	Water Line Excavation	5,511	0*
9	Water Line Bedding	1,102	0*
10	Water Line Backfill	4,409	0*
11	Pump House Excavation	300	0*
12	Pump House Fill	100	0*
11	Foundation Excavation	17,355	17,250
12	Foundation Backfill	11,570	11,500
13	Pipeline Excavation	3,344	0*
14	Pipeline Bedding	246	0*
15	Pipeline Backfill	2,787	0*
16	Electrical Interconnect Excavation	38	0*
17	Electrical Interconnect Backfill	N/A	0*
18	Soil Remediation – Roadway/Utility Excavation	3,085	0*

Notes: CY = cubic yards; VCM = Ventura Compressor Station Modernization; N/A = not applicable.

*Off-site infrastructure impacts do not apply to the VCM Project.

Please confirm that general information for each of the three site alternatives includes the following information (Sections 1.1.17–1.1.20) for each alternative site, access roads, electrical supply, and pipeline routes:

1.1.17 Site photos.

RESPONSE

The photo presented in Exhibit 1-1 below was taken by SoCalGas and Burns & McDonnell in April 2025 from publicly accessible areas or from land with SoCalGas access rights to assess site conditions. SoCalGas was not able to drive the access road to the site due to access denial by the landowner.

Site access was not granted by the landowner so detailed/close-up photos of the access road, electrical interconnect, and new pipeline alignment are not available.



Exhibit 1-1: West-facing view of the Avocado Site from across the valley

The following photos in Exhibits 1-2 and 1-3 are from Google Earth aerial imagery (Street View) published in June 2025.



Exhibit 1-2: North-facing view of the proposed temporary staging area

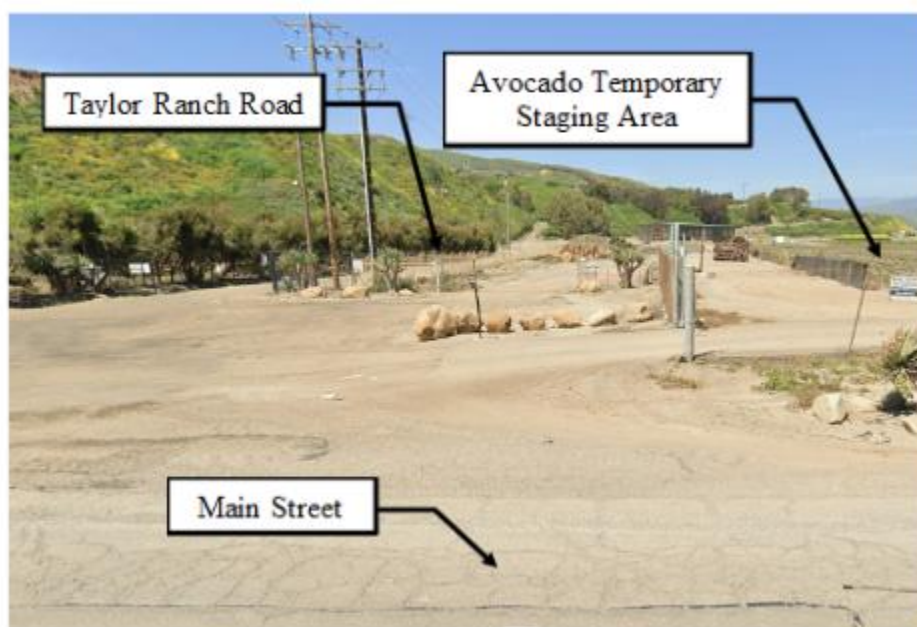


Exhibit 1-3: North-facing view of the entrance to Taylor Ranch Road from West Main Street

The following aerial photos in Exhibits 1-4 and 1-5 were taken by SoCalGas in March 2022 for the Feasibility Study that was requested by the CPUC in August 2021.



Exhibit 1-4: Southwest-facing view of the Avocado Site and proposed road alignment



Exhibit 1-5: West-facing view of the Avocado Site

1.1.18 Topographic maps.

RESPONSE

For the topographic maps for the Avocado Site, please refer to Appendix 1-A, Avocado Site Drawing 152084-7006-D-SKT for the Conceptual Topographic Map, Avocado Site Drawing 152084-7003-D-SKT for the Conceptual Grading Plan, and Avocado Site Drawing 152084-7005-D-SKT for the Conceptual Temporary Staging Area Grading Plan.

1.1.19 Site conditions description (e.g., existing exposed soil, pavement).

RESPONSE

The Avocado Site is situated on the hillside to the west of Highway 33 and the Ventura River. Immediately surrounding the site are native shrubs and plants on the north and west sides and avocado groves to the south and east, as shown on Exhibit 1-6.

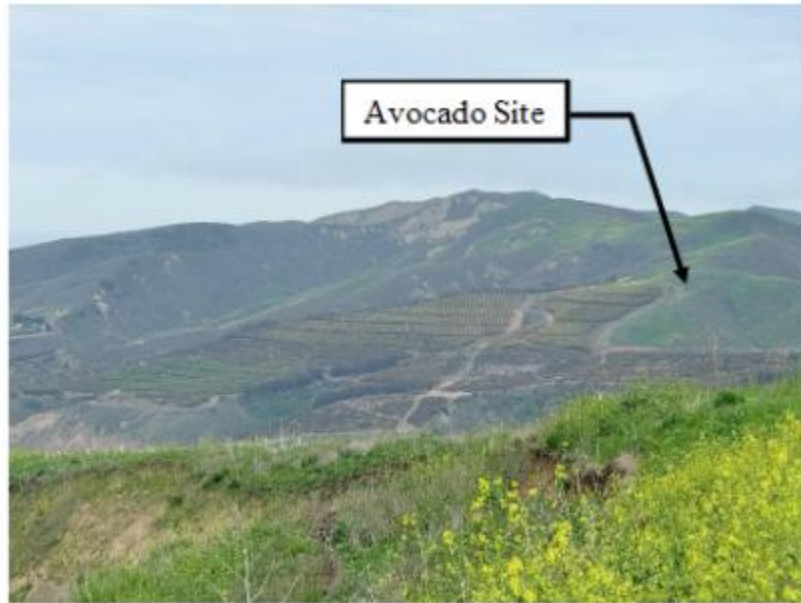


Exhibit 1-6: West-facing view of the Avocado Site and surrounding areas from across the valley

The site itself appears to be an undeveloped agricultural area with light vegetation (Exhibit 1-7).



Exhibit 1-7: West-facing view of the Avocado Site (via aerial photography, April 2025)

The off-site areas impacted by new utility installations and the access road are primarily existing avocado orchards and the existing unpaved Taylor Ranch Road that leads up the mountain through the orchards (Exhibit 1-8).



Exhibit 1-8: Southwest-facing view of the Avocado Site and proposed road alignment (via aerial photography, April 2025)

Along Taylor Ranch Road, there are some orchard operational support systems such as tanks, irrigation equipment, and a stormwater retention pond (Exhibit 1-9).



Exhibit 1-9: Avocado orchard support infrastructure, including irrigation equipment and retention pond, along Taylor Ranch Road (via Google Earth, May 2025)

1.1.20 Details about unique activities necessary to develop each site (e.g., regarding drainage, paving, cut/fill grading).

RESPONSE

The Avocado Site is remote and would require significant site development to support the facility, as follows: Although the site is a relatively short distance to the existing transmission pipeline infrastructure, it would require longer ancillary utility laterals such as water, wastewater, and electrical interconnect lines. Other unique activities for the Avocado Site are as follows:

- The site would require installation of approximately 3,200 feet (0.6 miles) of new gas pipeline system, consisting of two suction lines and two discharge lines 20 inches in diameter to tie the Avocado Site into the existing transmission pipeline infrastructure.
- Access to the site is currently an existing unpaved agricultural road. This road would require widening from a single lane to a double lane, re-grading, and paving to meet Ventura County Fire Department standards. The road would be about 12,800 feet (2.4 miles) long. Construction would require significant earthwork that would include excavation of approximately 60,003 cubic yards and fill of approximately 210,353 cubic yards, which may cause disturbance to the adjacent avocado groves. It is estimated that approximately 3,085 cubic yards of soil in the proposed roadway/utility corridor are impacted with pesticides or total petroleum hydrocarbons and would need to be managed accordingly during earthwork (Appendix 1-D, Desktop Hazards Assessment for VCM Project – Avocado Site, Section 9.2).
- The site is located on hilly terrain and would require significant grading to lower the elevation on the west side to approximately 125 feet and fill approximately 72 feet on the northeast side to prepare a pad for the compressor station. The current design incorporates a 2:1 slope for cut and fill. Construction would require significant earthwork that would include excavation of approximately 1,057,355 cubic yards and fill of approximately 586,570 cubic yards. During the next phases of design, site geotechnical investigation and detailed geologic hazard analyses would be completed that could justify a change in

the preliminary design for steeper slopes to reduce the excavation volume and environmental disturbance. See Avocado Site Drawing 152084-7003-D-SKT, Grading Plan, in Appendix 1-A for additional information regarding the site grading.

- The Avocado Site is remote and it is assumed that it will not be able to connect to the public sewer system through traditional gravity sewer lines; therefore, a small grinder pump and pressured wastewater line would be installed along Taylor Ranch Road to connect to the City sewer at West Main Street.
- The Avocado Site would also require connection to the City water main, with the connection assumed to be available at West Main Street. The water line would be installed along Taylor Ranch Road to connect to the site.
- The Avocado Site would connect power from the existing SCE Grandad circuit. To connect to this circuit, 17 new electrical poles would be installed along approximately 4,400 feet of Taylor Ranch Road to deliver power to the Avocado Site.

Please refer to Appendix 1-D, Desktop Hazards Assessment for VCM Project – Avocado Site, and Appendix 1-A for Avocado Site Drawing 152084-7003-D-SKT, Grading Plan.

1.1.21 If the areas for alternative site features, off-site infrastructure for alternative sites, or any extra work areas (e.g., staging or parking areas) are different from those considered since the mailing list was compiled by SoCalGas for the 2023 PEA, please provide the necessary changes to the comprehensive mailing list, consistent with the PEA Checklist requirements.

RESPONSE

Please refer to Appendix 1-E for the PDF of the updated mailing list for all the features and off-site infrastructure for the Avocado Site. The Excel file of the mailing list is included as Attachment 1-B.

1.2 Aesthetics

For each of the three site alternatives, please provide visual simulations from appropriate viewpoints depicting existing conditions and conditions with the features and land changes associated with development of each alternative site.

RESPONSE

Four visual simulations were created for the Avocado Site Alternative, including two simulations of the compressor station site and two simulations along the utility/roadway corridor. These visual simulations consist of photorealistic 3-D models of the Avocado Site Alternative's features and any related landform alteration. Public visibility of the Avocado Site was assessed based on reconnaissance, aerial maps, and where the compressor station and off-site components would be located. Based on this selection process, four key observation points, or "views," were selected, as listed below and shown on Exhibit 1-10:

- View 1: From the shoulder of Highway 33 just south of West Stanley Avenue, looking northwest

- View 2: From the shoulder of Highway 33 just north of West Stanley Avenue, looking northwest
- View 3: From the southern terminus of Taylor Ranch Road near Highway 101, looking north
- View 4: From the Grant Park Ridgeline Trail, looking northwest



Exhibit 1-10: Avocado Site overview showing Views 1–4

The capture time, date, and other technical details of the high-resolution photographs taken from View 1 through View 4 are provided in Table 1-6, below.

TABLE 1-6
Technical Details of Photographs – Avocado Site

Exhibit Nos.,^a View No.	Capture Time	Capture Date	Camera Type	Lens Focal Length	Camera Height	Direction
1-11a, 1-11b, View 1	9:37 a.m.	June 22, 2025	Canon EOS 6D	50 mm	Approximately 5.5 feet above ground level	Facing northwest
1-12a, 1-12b, View 2	10:28 a.m.	June 22, 2025	Canon EOS 6D	50 mm	Approximately 5.5 feet above ground level	Facing northwest
1-13a, 1-13b, View 3	3:16 p.m.	August 23, 2025	Canon EOS 6D	50 mm	Approximately 5.5 feet above ground level	Facing north
1-14a, 1-14b, View 4	2:03 p.m.	January 27, 2023	iPhone XS	50 mm ^b	Approximately 5.5 feet above ground level	Facing northwest

Notes: mm = millimeters.

^a Exhibits with “a” show the existing conditions; exhibits with “b” show visual simulations of the Avocado Site Alternative overlaid onto the photographs of the existing conditions.

^b Image was cropped to a 40 degree horizontal field of view to simulate a 50 mm lens focal length.

View 1 offers a view of the station from Highway 33, nearest to the hillside the station is located on. The primary visible difference in the simulations shown in Exhibit 1-11b (compared to the existing conditions shown in Exhibit 1-11a) is the overall grading of the hillside. When viewing the station from the base of the hillside, much of the station is obscured, although a portion can be seen in the top right corner of the hillside.



Exhibit 1-11a: View 1 – existing conditions



Exhibit 1-11b: View 1 – simulated Avocado Site Alternative conditions

View 2 displays the utility/roadway corridor as viewed from the valley along Highway 33. The addition of electrical poles can be seen in Exhibit 1-12b, with three depicted in the background on the right side of the image. The paving and widening of Taylor Ranch Road is largely obscured by the existing orchards and vegetation.



Exhibit 1-12a: View 2 – existing conditions



Exhibit 1-12b: View 2 – simulated Avocado Site Alternative conditions

View 3 shows the view of the utility/roadway corridor from the terminus of Taylor Ranch Road. The roadway paving and widening is visible in Exhibit 1-13b, as is the structure on the left.



Exhibit 1-13a: View 3 – existing conditions



Exhibit 1-13b: View 3 – simulated Avocado Site Alternative conditions

View 4 offers a view of the compressor station and utility/roadway corridor at a distance and from a higher vantage point than View 1. In Exhibit 1-14b, the compressor station is visible, as is the hillside grading, electrical pole additions, and the roadway grading, widening, and paving for Taylor Ranch Road.



Exhibit 1-14a: View 4 – existing conditions



Exhibit 1-14b: View 4 – simulated Avocado Site Alternative conditions

1.3 Air Quality, Greenhouse Gases, and Energy

For each of the three site alternatives, please include the following information:

- 1.3.1 Please provide emissions calculations to quantify the changes in air pollutants and greenhouse gas emissions stemming from construction of the site alternatives, as they may differ from those of the VCM Project (e.g., due to additional site preparation or grading).**

RESPONSE

Emissions calculations for the Avocado Site are presented in the Air Quality and Greenhouse Gas Emissions Analysis, included in Appendix 1-C to this document. Compared to the VCM Project, the Avocado Site would require additional construction activities due to its location in a relatively undeveloped greenfield area. A detailed comparison of the construction activity differences is provided in Table 1-7 below.

TABLE 1-7

Construction Activity Differences Between VCM Project and Avocado Site Alternative

Construction Phase	VCM Project	Avocado Site
Grading	Minimal grading since the VCM Project is already developed. There is an	The Avocado Site is located within undeveloped hilly terrain with light vegetation and is generally sloping.

TABLE 1-7**Construction Activity Differences Between VCM Project and Avocado Site Alternative**

Construction Phase	VCM Project	Avocado Site
	existing gas transmission pipeline system and existing access for the VCM Project.	There is significant amount of earthwork required to lower the overall site elevation to approximately 125 feet to develop a pad for the new compressor station, meet grading design for stability and proper drainage, and to comply with Ventura County stormwater management requirements.
Access Road	There is an existing access road available.	Re-grading, widening, and new paving for the existing access road is required.
Utilities	There is an existing connection available for utilities such as water, wastewater and power	New utilities lines for water and wastewater will be installed along the new access road that will connect to an assumed tie-in connection along West Main Street. For electrical interconnection, the preliminary routing of transmission poles has been identified in conjunction with Southern California Edison (SCE).

Note: VCM = Ventura Compressor Station Modernization.

1.3.2 Would the capacity and specifications for the proposed natural gas standby generator at site alternatives be the same as with the VCM Project?

RESPONSE

Yes, the capacity and specifications for the proposed natural gas standby generator at Avocado Site would be the same as the VCM Project. As stated in the PEA, this alternative would include one new 840 HP natural gas standby generator engine (standby generator), rated at approximately 560 kilowatts peak output power.

1.3.3 Will any existing emission sources remain over the long-term at the original project site if an alternative site is used?

RESPONSE

Yes, existing emission sources would remain over the long term at the original VCM Project Site if any of the three alternative sites are selected. The existing Ventura Compressor Station would be decommissioned approximately 1 year after an alternative site is fully operational, including three natural gas compressors and related station components, and all emissions associated with compressor operations would be eliminated. The identified remaining emission sources include (1) combustion emissions from a portable diesel emergency generator used for backup power in the event of a facility power outage, (2) fugitive emissions from the remaining transmission

pipeline components used to provide Meter Run services,³ and (3) potential pipeline blowdown emissions during maintenance and repair activities. By way of summary, this response will do the following:

1. Estimate criteria pollutants from the remaining portable diesel emergency generator.
2. Estimate natural gas volumes of fugitive emissions from the remaining transmission components used to provide Meter Run services and the estimated volume from pipeline blowdown emissions during maintenance and repair activities.
3. Estimate toxic air contaminants (TACs) and greenhouse gases (GHGs) associated with the natural gas volumes described above.

Criteria Pollutant Estimate: Portable Diesel Emergency Generator

Ventura Compressor Station uses a portable emergency generator to provide backup power during facility outages. The emergency generator will be providing backup power to the communications shelter located at the site to ensure communications and control functions pertaining to the gas transmission north coastal system pressures and flows are reliably monitored and maintained by SoCalGas during a power outage. This engine will remain at the facility if any alternative site is selected. Combustion emissions from the portable diesel emergency generator were estimated using a standard Ventura County Air Pollution Control District (VCAPCD) permitting calculation methodology.

A permit application was recently submitted for the permanent use of a new trailer-mounted Kubota emergency diesel-fired U.S. Environmental Protection Agency Certified Tier 4 Final engine-driven generator rated at 48.3 HP to replace the previous 68 HP diesel-fired emergency generator. The operating parameters for the portable generator are provided in Table 1-8. Under VCAPCD Rule 23.D.6, internal combustion engines rated below 50 HP are normally exempt from permitting; however, a permit application was submitted to ensure continued compliance with VCAPCD's Rule 35 elective emission limits. The annual criteria pollutant emissions (lb/year) were calculated based on the annual schedule of 100 hours per year. These emissions are minimal and are shown in Table 1-9 below.

TABLE 1-8
Portable Diesel Emergency Generator Operating Parameters

Parameter	Value	Units
Engine Rating	48.3	BHP
Hourly Schedule	1	Hours/Day
Worst-Case Daily Schedule	24	Hours/Day
Annual Schedule	100	Hours/Year

Notes: BHP = brake horsepower.

³ The "Meter Run" is a system of piping manifolds and valves that allows SoCalGas to control the system pressure differential and flow delivery from north to south, such as when La Goleta Storage Field is withdrawing from and supplying gas to the Los Angeles Basin.

TABLE 1-9**Portable Diesel Emergency Generator Criteria Pollutant Emissions**

Pollutant	Emission Factor (g/BHP-hr)	Hourly (lb/hr)^a	Annual (lb/yr)^b
VOC	0.12	0.01	1.27
NO _x	2.27	0.24	24.14
CO	0.03	0.003	0.32
PM	0.002	0.0002	0.02
SO _x	0.006	0.001	0.059

Notes: g/BHP-hr = grams per brake horsepower-hour; lb/hr = pounds per hour; lb/yr = pounds per year; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; PM = particulate matter; SO_x = sulfur oxides.

^a Hourly (lb/hr) = 48.3 BHP × Emissions Factor (g/BHP-hour) / 453.6 g/lb.

^b Annual (lb/yr) = hourly (lb/hour) × 100 hours.

Natural Gas Volume Estimate: Component Fugitives

If an alternative site is selected and the Ventura Compressor Station is decommissioned, only transmission components (e.g., pipelines, valves, flanges, connectors, meters, pigging equipment) used for Meter Run services would remain at the facility. The volume of natural gas emitted from these remaining components was estimated using Senate Bill (SB) 1371 Natural Gas: Leakage Abatement data and historical California Air Resources Board (CARB) Oil and Gas (O&G) Leak Detection and Repair (LDAR) Inspection Records, and is the same methodology used in CPUC Deficiency Request (DR) Question No. 17, Component Fugitives.⁴ To comply with SB 1371 requirements, SoCalGas reports Ventura Compressor Station's annual natural gas volumes from compressor and component fugitive leaks to CPUC and CARB. The calculated average natural gas volume from fugitive leaks, including those associated with compressor operations, is 61.49 thousand standard cubic feet per year (MSCF/year) using the Emission Year 2021 and Emission Year 2022 SB 1371 Annual Report, Transmission Compressor Station: Compressor and Component Fugitive Leaks data table. The average number of components inspected for fugitive leaks is approximately 3,263, calculated using 2021 and 2022 CARB O&G LDAR Inspection Records (Table A4). SoCalGas estimates that the number of components that would remain if the existing compressors were decommissioned would be approximately 1,519, representing only 46.5 percent of the original component count. Based on this reduced component count, the volume of fugitive natural gas emitted from the remaining transmission components was estimated to be 28.62 MSCF/year, as shown in Table 1-10.

TABLE 1-10**Estimated Component Fugitive Volumes from Remaining Facility**

Data	2021	2022	Average Data	Other
Fugitive LDAR Component Count	3,266	3,261	3,263	N/A
SB 1371 Component Fugitive Volume (MSCF/year) ^a	48.49	74.50	61.49	N/A
Estimated Remaining Facility Component Count	N/A	N/A	1,519	46.5% ^b

⁴ Response to the CPUC DR Area No. 2, DR Nos. 17 and 18, on the PEA for the Ventura Compressor Modernization Project submitted on October 11, 2024.

Estimated Total (MSCF/year)	28.62^c
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Notes: LDAR = Leak Detection and Repair; N/A = not applicable; SB = Senate Bill; MSCF/year = thousand standard cubic feet per year.

- ^a The reported historical volume is from the 2021 and 2022 SB 1371 Annual Reports submitted on June 15, 2022, and June 15, 2023, respectively.
- ^b SoCalGas divided the estimated remaining component count (1,519) by the original component count (3,263) and multiplied by 100% to determine the percentage of remaining components.
- ^c The historical volume of 61.49 MSCF/year was multiplied by the percentage of remaining components (46.5%) to estimate the remaining facility volume (MSCF/year).

Natural Gas Volume Estimate: Transmission Pipeline Blowdowns

If an alternative site is used, transmission pipelines would remain within the facility boundary and there is a potential for pipeline blowdowns to occur during maintenance or repair activities. SoCalGas cannot predict where the pipeline blowdown emissions will occur for a given operations and maintenance activity; therefore assuming blowdowns will occur within the facility boundary is highly speculative.⁵ Therefore, SoCalGas cannot accurately estimate pipeline blowdown emissions within the facility boundary and for purposes of this exercise assumes they are zero.

Finally, the use of isolation and blowdown valves, cross compression, and other enhanced maintenance considerations have greatly reduced potential vented emissions associated with blowdowns.

GHG Emission Estimates

To estimate the facility GHG emissions if the site is decommissioned, SoCalGas used the component fugitive volume of natural gas and converted it to metric tons of carbon dioxide equivalent (MTCO₂e). This is the same methodology that was used in response to the CPUC DR Question No. 17, Greenhouse Gas Emission Calculations.⁶ Based on this approach, total GHG emissions were estimated to be approximately 13 MTCO₂e/year, shown in Table 1-11.

TABLE 1-11

Estimated Greenhouse Gas Emissions (MTCO₂e) from Remaining Facility Components

Greenhouse Gas	Component Fugitives
NG Volume(MSCF/year)	28.62
NG Volume (SCF/year)	28,623
Mole Fraction Carbon Dioxide (CO ₂) ^a	0.0091
Mole Fraction Methane (CH ₄) ^a	0.9407
CO ₂ Volume (SCF) ^b	260.47
CH ₄ Volume (SCF) ^c	26,925.56

⁵ Please note that for baseline years 2021 and 2022, there were no reported pipeline blowdown activities within the Ventura Compressor Station area code. As a result, these emissions were not included in CPUC DR Nos. 17 and 18.

⁶ Response to the CPUC DR Area No. 2, DR Nos. 17 and 18, on the PEA for the Ventura Compressor Modernization Project submitted on October 11, 2024.

Density CO ₂	0.0526
Density CH ₄	0.0192
Global Warming Potential (GWP) CO ₂	1
GWP CH ₄ ^d	25
MTCO ₂ /year ^c	0.01
MTCH ₄ /year ^f	0.52
MTCO _{2e} /year ^g	12.9
Total (MTCO _{2e} / year)	13

Notes: MTCO_{2e} = metric tons carbon dioxide equivalent; NG = natural gas; MSCF/year = thousand standard cubic feet per year; SCF = standard cubic feet; MTCH₄ = metric tons methane.

^a Average mole fractions based on continuous Gas Control data.

^b Converted NG (SCF) volume to CO₂ volume (SCF) = NG volume (SCF) × CO₂ (mole).

^c Converted NG (SCF) volume to CH₄ volume (SCF) = NG volume (SCF) × CH₄ (mole).

^d GWP for methane from the CARB required reporting value based on the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4).

^e Metric tons of CO₂ (MTCO₂) = CO₂ Volume (SCF) × Density (CO₂) × 10⁻³.

^f Metric tons of CH₄ (MTCH₄) = CH₄ Volume (SCF) × Density (CH₄) × 10⁻³.

^g Metric tons of CO₂-equivalent (MTCO_{2e}) = (MTCO₂ × GWP[CO₂]) + (MTCH₄ × GWP[CH₄])

Toxic Air Contaminants (TAC) Estimates

To estimate the facility TAC emissions if the site is decommissioned, SoCalGas used the same methodology as the response to the CPUC DR Question No. 17, TAC Emissions Calculations.⁵ The calculations are based on sampled natural gas analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) according to U.S. Environmental Protection Agency Method TO-15. The estimated TAC emissions for the decommissioned facility are shown in Table 1-12 below.

TABLE 1-12
Estimated TAC Emission Rates from Remaining Facility Components

TAC	CAS NO.	Fugitive Components	
		Maximum Hourly Emissions (lb/hr) ^a	Annual Emissions (lb/yr) ^b
Benzene	71432	1.04E-06	9.14E-03
Toluene	108883	1.49E-06	1.31E-02
Ethylbenzene	100414	8.79E-08	7.70E-04
Xylenes	1330207	6.57E-07	5.76E-03

Notes: TAC = toxic air contaminant; lb/hr = pounds per hour; lb/yr = pounds per year.

^a Maximum hourly emissions (lb/hr) = maximum hourly emissions (thousand standard cubic feet per hour [MSCF/hr]) / 1,000 × emission factor (pounds per million standard cubic feet [lb/MMSCF]). The numbers shown in this table are calculated by spreadsheet and may differ from hand-calculation due to rounding.

^b Annual emissions (lb/yr) = annual emissions (MSCF/yr) / 1,000 × emission factor (lb/MMSCF). The numbers shown in this table are calculated by spreadsheet and may differ from hand calculation due to rounding.

1.4 Biological Resources

Please provide a Biological Resources Technical Report (BRTR) for each of the three site alternatives, consistent with the information provided for the VCM Project in the PEA and with the BRTR standards identified in Attachment 2 of the PEA Checklist.

Please also provide the biological resources GIS data for the VCM Project and alternative sites, including any vegetation mapping, special-status species locations and critical habitat, and jurisdictional wetlands and waters.

RESPONSE

A Biological Resources Technical Report has been prepared for the Avocado Site Alternative consistent with the standards identified in Attachment 2 of the PEA Checklist and is included as Appendix 1-F. The GIS data for both the VCM Project and the Avocado Site Alternative have been submitted as Attachment 1-C, which includes both KMZ and SHP files.

1.5 Cultural Resources

Please provide a Cultural Resources Inventory Report and a Tribal Consultation Report for each of the three site alternatives, consistent with the information provided for the VCM Project in the PEA and with Cultural Resources Technical Report standards identified in Attachment 3 of the PEA Checklist.

RESPONSE

A Cultural Resources Inventory Report has been prepared for the Avocado Site per the standards identified in Attachment 3 of the PEA Checklist. The Cultural Resources Inventory Report is included as Appendix 1-G to this document.

In addition, a Tribal Consultation Report was prepared for the Avocado Site. The Tribal Consultation Report is included as Appendix 1-H to this document.

1.6 Geology, Soils, and Paleontological Resources

For each of the three site alternatives, please include the following information (see Sections 1.6.1 and 1.6.2):

- 1.6.1 Please identify and describe soil types for each alternative site and provide preliminary geotechnical requirements to identify anticipated geotechnical hazards, seismic hazards, and subsurface conditions at the alternative sites. This information should identify any conditions that would potentially require geotechnical and engineering design measures to reduce impacts.**

RESPONSE

This response provides a summary of soil types, anticipated geotechnical and seismic hazards, and subsurface conditions for the Avocado Site. The response is based on a desktop review and

preliminary geotechnical assessment conducted by Geosyntec Consultants (2025) and Burns & McDonnell (2025), which are included as Appendix 1-I and Appendix 1-J, respectively. The Geosyntec and Burns & McDonnell reports, in combination, emphasize the different geotechnical aspects of the Avocado Site. As such, portions of the analysis from each report were used to develop the response below. Both reports recommend that comprehensive, site-specific geotechnical investigations be completed at the site prior to final design.

General Site Conditions

The Avocado Site is located approximately 3,000 feet west of the existing Ventura Compressor Station property on the existing transmission pipeline corridor. The high-elevation plot is approximately 30 acres in area and extends over an existing ridgeline approximately 1,000 feet due south of the fork of Devil's Canyon Road and Taylor Ranch Road. The site is steeply sloped and extends down the northern- and eastern-facing foothills that generally frame the west side of Devil's Canyon and the Ventura River in Ventura County, California. The site is bounded by agricultural avocado groves to the south and east. Active oil and gas fields lie to the north. Based on historical aerial imagery (post-1994, via Google Earth), the site has remained undeveloped (greenfield), with the neighboring avocado groves having been established sometime between 2009 and 2011 (Appendix 1-J, p. 1).

Proposed Alignment 1 encompasses two pipelines: one for suction and one for discharge. The two pipelines are each 0.18 miles in length and extend from the eastern edge of the Avocado Site boundary. The proposed pipeline alignment extends through existing avocado groves and is steeply sloped (5 to 40 percent), with approximately 110 feet of total elevation change along its length.

Proposed Alignment 2 also encompasses two pipelines: one for suction and one for discharge. The two pipelines are each 0.12 miles in length and extend from the eastern edge of the Avocado Site boundary. The proposed pipeline alignment extends through existing avocado groves. Alignment 2 is steeply sloped (20 to 55 percent), with approximately 125 feet of total elevation change along its length (Appendix 1-J, p. 2).

Seismic Hazards

Faulting

The Avocado Site is located in a seismically active region of Southern California. Faults in California are generally classified as “Holocene active,” “Pre-Holocene active,” or “age undetermined.” The division of these major groups is based on criteria by the California Geological Survey (CGS) for the Alquist–Priolo Earthquake Fault Zoning Program, summarized below (from CGS’s 2018 Earthquake Fault Zones: A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California; available at <https://www.conservation.ca.gov/cgs/publications/sp42>):

- Holocene-active faults are faults that have moved during the past approximately 11,700 years. These faults, which are also known as active faults, are capable of surface rupture.
- Pre-Holocene faults are faults that have not moved in the past 11,700 years. These faults, which are also known as potentially active faults, may be capable of surface rupture, but

are not regulated under the Alquist–Priolo Earthquake Fault Zoning Act of 1972 (Alquist–Priolo Act).

- Age-undetermined faults are faults where the recency of fault movement has not been determined. These faults are also known as inactive faults.

This fault classification is consistent with criteria of the Alquist–Priolo Act. The Alquist–Priolo Act regulates development near Holocene-active faults to mitigate the hazard of surface fault rupture. The Alquist–Priolo Act requires the State Geologist to establish regulatory zones, known as Alquist–Priolo Earthquake Fault Zones (Alquist–Priolo Zones), around the surface traces of Holocene-active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones. The Avocado Site is not located within a currently established Alquist–Priolo Zone for surface fault rupture hazard.

The Red Mountain Fault Zone and Ventura Fault are the closest major Holocene-active faults to the Avocado Site. The Red Mountain Fault Zone is a well-constrained series of reverse faults that trend south from Ojai Valley, continue northwest subparallel to the Pacific Ocean coastline, and extend offshore south of Carpinteria. The Ventura Fault is a well-constrained, north-dipping, reverse fault that extends approximately 8.1 miles east from the Pacific Ocean along the southern base of Ventura’s foothills. The closest pre-Holocene fault to the Avocado Site includes a moderately constrained unnamed fault that extends 2.3 miles west from the foothills of northern Ventura and into the foothills to the west. The closest fault is 0.7 miles northeast of the site; therefore, the likelihood of fault rupture is low. Distances to regional faults and the mean 30-year participation probability are shown in Table 1-13.

TABLE 1-13
Summary of Nearby Faults

Fault	Distance from Avocado Site (Miles) ^a	Mean 30-Year Participation Probability (%) ^b			
		M ≥ 6.7	M ≥ 7.0	M ≥ 7.5	M ≥ 8.0
Unnamed Fault in California	0.7	NR	NR	NR	NR
Ventura–Pitas Point	1.5	1.42	1.40	0.97	<0.01
Red Mountain Fault Zone (South Strand)	4.8	3.00	2.42	0.13	NR
Javon Canyon	4.8	NR	NR	NR	NR
Sisar	5.5	0.60	0.60	0.53	<0.01
Faults near Oakview and Meiners Oaks	6.6	NR	NR	NR	NR
San Cayetano	11.7	1.69	1.58	0.82	<0.01
Santa Ynez	13.2	1.37	1.30	0.54	NR
Mission Ridge Fault System (Mission Ridge Section)	19	0.64	0.59	0.49	NR
Pine Mountain	19.4	0.42	0.24	0.04	NR

TABLE 1-13
Summary of Nearby Faults

Fault	Distance from Avocado Site (Miles) ^a	Mean 30-Year Participation Probability (%) ^b			
		M ≥ 6.7	M ≥ 7.0	M ≥ 7.5	M ≥ 8.0
Oak Ridge (Barksdale Section)	21.3	1.90	1.54	1.05	<0.01
Big Pine Fault Zone	24.6	0.32	0.15	0.05	NR
Northridge	35.2	0.85	0.79	0.50	<0.01
San Gabriel Fault Zone	36	0.59	0.57	0.52	0.03
San Andreas Fault Zone	37.9	17.03	16.97	16.82	6.61

Source: Appendix 1-I.

Notes: NR = not reported.

^a Distances from site noted are the closest distances to the surface trace or inferred projection of the fault as measured from mapped traces in the 2017 U.S. Geological Survey Quaternary Fault and Fold Database of the United States (available at <https://www.usgs.gov/programs/earthquake-hazards/faults>).

^b As reported by the Uniform California Earthquake Rupture Forecast, Version 3 (UCERF3)—The Time-Independent Model (USGS Open-File Report 2013–1165; CGS Special Report 228; Southern California Earthquake Center Publication 1792; available at <https://pubs.usgs.gov/of/2013/1165/>).

Secondary Seismic Effects

Liquefaction

Liquefaction occurs primarily in saturated, loose, fine- to medium-grained soils in areas where the groundwater table is within approximately 50 feet of the surface. Shaking causes the soils to lose strength and behave like a liquid. Excess water pressure is vented upward through fissures and soil cracks and can also result in a water/soil slurry flowing onto the ground surface. Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and flow failures or slumping. Lateral spreading is the lateral movement of gently to steeply sloping saturated soil deposits that are caused by earthquake-induced liquefaction. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases.

According to Burns and McDonnell (Appendix 1-J), the Avocado Site and both proposed pipeline alignments are not located within a liquefaction zone. According to Geosyntec, anticipated depth to groundwater is estimated to be greater than 40 feet; therefore, the liquefaction potential is considered low (Appendix 1-I, p. 6).

Seismically Induced Slope Failure

Landslides within the Ventura area are abundant due to rapid uplift and deformation of sedimentary formational deposits that range greatly in consistency from unconsolidated to well indurated. Specific formational units such as the Santa Barbara and Pico Formations are typically more prone to landsliding following periods of above-average rainfall or seismic shaking from near or more distant seismic sources.

According to CGS's 2003 Seismic Hazard Zone Report for the Ventura 7.5-Minute Quadrangle, Ventura County, California (available at <https://maps.conservation.ca.gov/cgs/information/warehouse/eqzapp/>), the Avocado Site is located within a mapped landslide hazard zone and the site is underlain by the landslide-prone Pico Formation, which consists of weakly cemented sandstone, siltstone, and mudstone. No mapped landslides have been identified within the immediate site area; however, given the moderately steep terrain and anticipated subsurface conditions, the risk of slope instability associated with landslides and seismically induced landsliding is considered high. Additionally, both pipeline alignments have high risk of landslide due to mapped debris slides and susceptible formations (Appendix 1-J, p. 5).

Rockfall hazards are typically associated with unstable rock outcrops on steep terrain that undergo climatic or biological changes, which include pore pressure, freeze–thaw cycles, root growth, and weathering. Topography within the Avocado Site's mapped buffer zone (Appendix 1-I, Figure 5) does not include slopes that exceed 60 degrees; therefore, rockfall hazard risks are considered low (Appendix 1-I, p. 5).

Geologic Units

Stratigraphy

The Avocado Site consists of undivided Pleistocene stream terrace deposits (Qpt), made up of clay, sand, gravel, cobbles, and boulders, and Holocene and Pleistocene landslide deposits (Qls), alluvial deposits, and colluvial deposits, underlain by sedimentary bedrock at depths typically within 6 feet below ground surface (Appendix 1-J, p. 4). The subsurface bedrock is primarily sedimentary, consisting of Santa Barbara Formation and Pico Formation, which are composed of claystone, siltstone, sandstone, and shale (Appendix 1-J, pp. 2–3). The pipeline alignments consist of similar surficial deposits (Pleistocene stream terrace deposits, Pleistocene landslide deposits, and Pico Formation), underlain by bedrock with varying depths of 1 foot to 3 feet below ground surface and in some areas greater than 6 feet below ground surface (Appendix 1-J, p. 3).

Slope Stability

The Avocado Site is located in the foothills approximately 1.5 miles north of U.S. Route 101 and 0.5 miles west of Highway 33/Stanley Avenue. Based on aerial imagery, the site is situated on moderately steep terrain and bordered by agricultural crops to the south and east. This site is underlain by Holocene-age terrace and alluvial deposits of consolidated clay, sand, gravel, and cobble, with some boulder-sized material. The Pleistocene-age Pico Formation and Santa Barbara claystone are mapped on the northern slope adjacent to the site with an approximate structural orientation of N85 degrees W and bedding dip of 33 to 36 degrees to the southwest.

As mentioned above, rockfall hazards are typically associated with unstable rock outcrops on steep terrain that undergo climatic or biological changes, which include pore pressure, freeze–thaw cycles, root growth, and weathering. Topography within the Avocado Site's mapped buffer zone does not include slopes that exceed 60 degrees; therefore, rockfall hazard risks are considered low (Appendix 1-I, p. 5). Additionally, given the moderately steep terrain and anticipated subsurface conditions, the risk of slope instability associated with landslides and seismically induced landsliding is considered high (Appendix 1-I, p. 5).

Subsidence

“Subsidence” is the permanent collapse of the pore space within a soil or rock and downward settling of the earth’s surface relative to its surrounding area. Subsidence can result from the extraction of water or oil, the addition of water to the land surface—a condition called “hydrocompaction”—or peat loss. The compaction of subsurface sediment caused by the withdrawal or addition of fluids can cause subsidence. Land subsidence can disrupt surface drainage; reduce aquifer storage; cause earth fissures; damage buildings and structures; and damage wells, roads, and utility infrastructure. Several areas within Ventura County are experiencing subsidence due to groundwater extraction, including the Oxnard Plain, the Las Posas Valley, and the Santa Clara River Valley (County of Ventura GIS’s 2020 mapping of the County; available at <https://maps.ventura.org/countyview/>). According to the U.S. Geological Survey’s 2023 Areas of Land Subsidence in California map (available at https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html), there have been no recorded instances of subsidence at the Avocado Site or the pipeline alignment areas associated with groundwater pumping, peat loss, or oil extraction.

Expansive Soil

Expansive soils are clay-rich soils that expand when water is added and shrink when dry. This continuous change in soil volume can cause foundations to move unevenly and crack. Potentially compressive and unsuitable materials in surficial soils may be present at the Avocado Site and both pipeline alignments. For shallow foundations, depending on the severity of the compressibility/shrink–swell potential, additional mitigation measures may be required, such as over-excavation and replacement. If deep foundations are required, increased embedment depths may be needed (Appendix 1-J, p. 10).

Tsunamis and Flooding

The likelihood of flooding and tsunamis in the Avocado Site or the proposed alignment areas are both low. The site is designated as Zone ‘X,’ which is an area of minimal flood hazard, according to FEMA, and the site is outside any mapped tsunami hazard areas (Appendix 1-J, p. 6).

Soils

Soil types at the Avocado Site generally consist of unconsolidated clay, sand, gravel, and cobble soils with some boulder-sized material (Undivided Pleistocene stream terrace deposits [Qpt]) underlain by sedimentary bedrock consisting of claystone, siltstone, and shale (associated with Pleistocene Santa Barbara [Qsb], and Pico [Tp] Formations). Holocene and Pleistocene landslide deposits (Qls) (including numerous active slides) composed of weathered, broken-up rocks were also identified near or within the limits of permanent disturbance for the site (Appendix 1-J, p. 2).

Both pipeline alignments run through Undivided Pleistocene stream terrace deposits (Qpt), characterized by the presence of unconsolidated clays, sands, gravels, cobbles, and some boulder-sized materials. Additionally, both alignments run near mapped Holocene and Pleistocene landslide deposits susceptible to renewed sliding (Qls) (Appendix 1-J, p. 3).

Please refer to Appendices 1-I and 1-J for the geotechnical assessments for the Avocado Site prepared by Geosyntec and Burns & McDonnell, respectively.

1.6.2 Please provide a Paleontological Resources Inventory Report at similar level of detail as provided for the VCM Project.

RESPONSE

Please see Appendix 1-K for the Paleontological Resources Inventory Memorandum (both public and confidential versions) for the Avocado Site.

1.7 Hydrology, Water Quality, and Groundwater

Please provide a summary of hydrology drainage plans applicable to each alternative site, including an identification of the stormwater management methods likely to be feasible for each alternative site. This information should provide a qualitative evaluation of drainage impacts for each alternative site relative to the VCM Project site.

RESPONSE

The Avocado Site is located near the top of a large coastal hillside on moderate to steep slopes. The Avocado Site currently has no industrial development and consists of somewhat sparsely vegetated grassland and shrubs adjacent to an avocado orchard and undeveloped hillside areas. An unvegetated firebreak is present adjacent to the avocado grove on the southern and eastern perimeter of the site. The on-site slope ranges from a low of 0 percent to a high of more than 60 percent, with a site average of approximately 39 percent. The Avocado Site is bisected by an east-trending canyon, which funnels most of the stormwater runoff toward the east and the Ventura River at the base of the large hillside. Stormwater runoff on the southern portion of the site flows to the south and southeast.

The Avocado Site development would include grading the site to nearly flat grades. The site will be surfaced with asphalt pavement and aggregate surfacing, thereby increasing the amount of impervious surface and associated increased stormwater runoff. However, following grading, the reduction in slope gradient and construction of drainage improvements is anticipated to result in stormwater runoff rates less than or equal to existing conditions.

No grading or earthwork would be required at the Staging Area, which would be used only as a temporary laydown yard for construction equipment.

Construction

Construction activities at the Avocado Site would be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including into stormwater or nearby surface water bodies. Compliance with the State Water Resources Control Board regulations requires preparation and implementation of a SWPPP, in accordance with the National Pollutant Discharge Elimination System Construction General Permit. The SWPPP must

include best management practices (BMPs), including erosion control measures and proper handling of petroleum products, such as proper petroleum product storage and spill response practices, to prevent pollution in stormwater discharge during construction activities.

Operations

The Avocado Site is subject to the requirements in the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (2025 Reissuance; available at <https://vcstormwater.org/publications/manuals/tech-guide-manual/>), which requires that the selection of Stormwater BMP Design for new development and redevelopment projects prioritize on-site infiltration, bioretention, and/or rainfall harvest and use unless it is technically infeasible. Infiltration, the County's preferred method of stormwater treatment, is proposed at the site. As currently designed, the proposed location of the infiltration basins is adjacent to the facility in an excavated area. See Avocado Site Drawing 152084-3001-D-SKT Rev 0, Conceptual Plot Plan, showing the location of the infiltration basins, and Avocado Site Drawing 152084-7002-D-SKT Rev 0, Conceptual Site Surfacing Plan, for details (refer to Appendix 1-A to this document). The feasibility of using infiltration basins to control stormwater runoff would be subject to local permitting agency approval.

In compliance with the 2025 Ventura County Technical Guidance Manual, the amount of detained stormwater would be equal to the 85th percentile 24-hour runoff event, determined for the proposed Avocado Site as the maximized capture stormwater volume using a 48- to 72-hour drawdown time.

As a result, stormwater runoff rates would be comparable to under existing conditions. Development of the Avocado Site would not substantially alter the existing drainage of the site such that increased stormwater runoff rates would exceed the capacity of existing or planned stormwater drainage systems. In addition, proposed stormwater controls would prevent potential inundation of proposed storage tanks and hazardous materials/waste containers.

No site assessment, geotechnical investigation, or topographic survey has been performed at the Avocado Site to determine soil type, local groundwater conditions, or surface drainage. Based on regional geologic maps of the area, the Avocado Site is underlain by landslide deposits, claystone, siltstone, and sandstone. As such, the rate of infiltration cannot be determined until on-site investigations are completed. Should infiltration basins not be feasible, bioswales will be developed in the same areas currently designated for the infiltration basins. The infiltration basins or bioswales will provide some stormwater detention, which is assumed to be sufficient to meet the requirements. Excess flows will be routed to the east into the natural canyon.

All hazardous materials would be stored in compliance with all applicable federal, state, and local regulations, and the waste materials would be transported off site as needed by a licensed contractor for proper treatment and disposal, thus minimizing the potential for spills and impacts to stormwater quality during operations. The facility would operate in accordance with a hazardous materials business plan and integrated stormwater/oil spill prevention and countermeasure plan.

Comparison to VCM Project

Impacts related to hydrology and water quality would be greater for short-term construction impacts and for long-term operational impacts under the Avocado Site Alternative compared to the VCM Project. Impacts would be more widespread under the Avocado Site Alternative than under the VCM Project because it would require substantial grading on site and improvements off site that would change the drainage pattern of the site. Based on a preliminary desktop assessment, the proposed methodology for stormwater management at the Avocado Site is construction of detention/infiltration basins to treat stormwater runoff at the site prior to its being released off site into adjacent drainages. This scenario is in contrast to the VCM Project, which would include construction of a lined stormwater detention structure with filters to treat stormwater runoff. Similar to the VCM Project, a SWPPP would be developed and implemented during construction of the Avocado Site Alternative in accordance with the Construction General Permit. The new compressor facility and off site improvements would comply with all hazardous storage regulations and would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality.

Please refer to Appendix 1-A for Avocado Site Drawings 152084-3001-D-SKT and 152084-7002-D-SKT, showing the Conceptual Plot Plan and Conceptual Site Surfacing Plan, respectively.

1.8 Mineral Resources

Please provide a quantification of existing wells on the alternative sites. Please identify which wells, and how many, would be subject to decommissioning per each alternative.

RESPONSE

There are no existing oil wells at the Avocado Site per the current CalGEM database.

1.9 Noise

For each of the three site alternatives, please include the following information (Sections 1.9.1–1.9.3):

1.9.1 Please list and map all sensitive receptors within one mile of each alternative compressor station site and tabulate the distances of noise sensitive areas from the sites.

RESPONSE

Sensitive land uses are generally defined as locations where people reside or where the presence of noise could adversely affect the use of the land. The City of Ventura defines noise sensitive properties as residences; schools; hospitals; and convalescent care, boarding, and rest homes, regardless of the underlying zoning.

The 487 noise sensitive properties within 1 mile of the Avocado Site are listed in Appendix 1-L, including information on location, land use, and distance from the alternative site. Figure 1 in Appendix 1-L displays these same noise sensitive properties.

- 1.9.2 Please provide a noise study for each alternative site, including measurement or estimation of the existing ambient sound environment based on current land uses and activities, and a quantification of noise levels during operation that could exceed pre-project conditions at the alternative sites.**

RESPONSE

Please refer to Appendix 1-M for the noise study prepared for the Avocado Site.

- 1.9.3 Will any existing noise sources remain over the long term at the original project site if an alternative site is used? If so, please identify these noise sources and quantify associated noise levels.**

RESPONSE:

SoCalGas anticipates that the following three noise sources will remain over the long term at the existing site if an alternative site is selected:

- Standby generator
- Air compressor
- Meter run system

A noise study for the remaining long-term noise sources at the VCM Project site was prepared and is included as Appendix 1-N to this document.

Please refer to Appendix 1-N for detailed information regarding long-term remaining noise sources at the Avocado Site.

1.10 Transportation

Please provide the following information for each of the site alternatives (see Sections 1.10.1 and 1.10.2).

- 1.10.1 Expand the Summary of Baseline (2016) Vehicle Miles Traveled (PEA Table 5.17-1) to include each alternative site.**

RESPONSE

As shown in Table 1-14, the City's total work-based vehicle miles traveled (VMT) per employee is 17.37, the total work-based VMT per employee is 19.10 for the VCM Project Site's Transportation Analysis Zone (TAZ), and the total work-based VMT per employee is 24.93 for the Avocado Site's TAZ, which is similar to but slightly higher than the total work-based VMT per employee for unincorporated Ventura County (23.98).

TABLE 1-14**Summary of Baseline (2016) Vehicle Miles Traveled by Project Site**

Location	TAZ	Total Home-Based VMT/Capita	Total Work-Based VMT/Employee	Total VMT/Service Population
City of Ventura	N/A	11.79	17.37	26.66
Unincorporated Ventura County	N/A	20.78	23.98	31.21
Overall Ventura County	N/A	16.48	19.09	27.25
VCM Project Site	60008301	14.39	19.10	21.74
Alternative				
Avocado Site	60002301	11.58	24.93	27.71

Source: Ventura County Transportation Commission's 2025 Ventura County Transportation Model, available at <https://www.goventura.org/work-with-vctc/traffic-model/>.

Notes: TAZ = transportation analysis zone; VMT = vehicle miles traveled; N/A = not applicable; VCM = Ventura Compressor Station Modernization.

1.10.2 Identify whether construction vehicle trips for each alternative site would be different from those of the VCM Project in PEA Table 5.17-3.

RESPONSE

As detailed in Table 1-15 below, Phases A1–A4 and 1–3 for the Avocado Site would be in addition to the construction phases in the VCM Project. The construction of the Avocado Site Alternative would not include Phase 2, Existing Project Site Demolition, which was included for the VCM Project. Finally, the total days of construction for each phase of the Avocado Site Alternative are slightly different than those of the VCM Project. As detailed in the VMT spreadsheet in Attachment 1-D, overall construction VMT for the Avocado Site Alternative would be slightly less than that of the VCM Project.

TABLE 1-15**Daily One-Way Trips and VMT by Phase and Total VMT for Vendor/Worker Vehicles**

Phase No.	Work Description	No. of Daily One-Way Trips	Total Daily Phase VMT	Total VMT per Phase
A1	Site Assessment	10	100	400
A2	Soils Remediation	44	1,160	1,160
A3	Gas Pipeline Installation	37	626	13,146
A4	Electrical Interconnect	48	645	28,380
1	Off site Laydown Development & Facility Clearing, Grubbing, Initial Site Excavation	54	925	40,700

TABLE 1-15**Daily One-Way Trips and VMT by Phase and Total VMT for Vendor/Worker Vehicles**

Phase No.	Work Description	No. of Daily One-Way Trips	Total Daily Phase VMT	Total VMT per Phase
2	Road Widening and Utilities	117	2,502	510,408
3	Mass Excavation and Cut Disposal	137	3,818	607,062
4	Foundations	94	1,250	213,750
5	Trenching/Undergrounds	57	849	49,242
6	Equipment, Structural Steel and Building Erection, and Piping	101	1,295	287,490
7	Electrical and Instrumentation	53	561	128,469
8	Paving	34	712	30,616
9	Painting/Insulation	13	409	17,178
10	Commissioning/Startup and Testing	43	523	59,622
11	Site Restoration	14	574	12,628
12	Decommissioning/Demolition	49	520	35,360

Note: VMT = vehicle miles traveled.

1.11 Utilities and Service Systems**Please provide the following information for each alternative (see Sections 1.11.1–1.11.3).****1.11.1 Description and quantification of the new gas pipelines/utilities to be installed as part of each alternative. Clarify if any of these would require relocation of existing utility infrastructure.****RESPONSE****Gas Pipeline**

The proposed facility at the Avocado Site would require four new natural gas transmission pipelines. There would be two suction lines and two discharge lines that would tie into existing transmission lines L-1005 and L-1004. See Table 1-16 below for size and length of the new pipelines. See Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 1-A for the pipeline alignment and transmission tie-in locations.

Water

The Avocado Site is remote and is assumed to not be connected to existing City water mains. The closest water main to the site is located near West Main Street, which is approximately 12,000 feet away. The site elevation is approximately 650 feet higher than this existing City water main and may result in insufficient water pressure needed for fire protection. Therefore, a storage

tank that provides sufficient volume for fire protection requirements would be constructed. Filling this tank and providing potable water would be served by the construction of a private high-pressure water transmission pipeline from a municipal main. A pump station would be constructed to meet the flow and pressure requirements for the site. A small pump station would be constructed to house the pump. See Table 1-16 below for the size and length of the new water line. See Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 1-A for the waterline alignment and proposed pump station location.

Wastewater

The Avocado Site is remote and is not close to existing City sewer lines. Due to the elevation difference between the site and existing City sewer mains, constructing a standard gravity sewer extension is impractical. Therefore, a grinder pump is proposed for the site. This pressure line would be routed along the access road to an existing sewer main along West Main Street. Additional site investigation will be needed to confirm the tie-in location to the public sewer system. See Table 1-16 below for the size and length of the new wastewater line.

Southern California Edison (SCE) Electrical Interconnection

SCE would install 17 new poles to connect the Avocado Site to the existing SCE Grandad circuit. No electrical substation would be required for this alternative. See Avocado Site Drawing 152084-7004-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 1-A for the electrical alignment, pole types, and assumed tie-in location. See Table 1-16 below for the length of the new electrical interconnect. See also Avocado Site Drawing 152084-5520-D-SKT, Electrical Distribution Interconnect Preliminary Details, in Appendix 1-A.

Mapping of Above- and Belowground Utilities

Based on a desktop study, there are no potential interferences with any existing utilities and nearby installations. However, a site investigation will be needed at a later stage to confirm if any gas or utility lines need to be relocated or abandoned.

Preliminary Quantification of Utility Lines

See Table 1-16 below for preliminary sizes and lengths of the gas pipelines, waterline, wastewater line, and electrical interconnect. These values are approximations and will need to be validated and updated in future phases of design.

TABLE 1-16
Summary of New Utilities for Avocado Site Alternative

Utility	Size (Inches in Diameter)	Length (Feet)
Suction Gas Lines	20	1,600
Discharge Gas Lines	20	1,600
Water Line	6	12,000
Wastewater Line	1	12,000
Electrical Interconnect	N/A	4,100

Note: N/A = not applicable.

Please refer to Appendix 1-A for Avocado Site Drawings 152084-7004-D-SKT and 152084-5520-D-SKT, showing the Conceptual Pipeline & Utility Plan and Electrical Distribution Interconnect Preliminary Details.

1.11.2 Quantify the amount of wastewater and solid waste that would be generated at each alternative site for both the construction phase and the operations and maintenance phase.

RESPONSE

The estimated amount of wastewater and solid waste that would be generated for the Avocado Site Alternative for both the construction phase and the operations and maintenance phase is provided below:

Construction Phase

The preliminary quantities for solid waste and wastewater for the Avocado Site Alternative during construction are estimated in Table 1-17 below (originally from Table 5.19-5 in the PEA).

TABLE 1-17
Avocado Site Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Avocado Site Alternative Estimated Total (Pounds)	Disposal Method
Access Road	Solid	Construction	Human Waste/ Refuse – Road	N/A	312,000	Portable Toilet Service Disposal
Access Road	Solid	Construction	Post-Consumer Food Waste – Road	N/A	115	Landfill
Facility	Solid	Construction	Human Waste/ Refuse	720,000	720,000	Portable Toilet Service Disposal

TABLE 1-17
Avocado Site Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Avocado Site Alternative Estimated Total (Pounds)	Disposal Method
Facility	Solid	Construction	Post-Consumer Food Waste	300	300	Landfill
Facility	Solid	Construction	Asphalt (Demo)	4,650,000	0	Landfill
Facility	Solid	Construction	Concrete (Demo)	440,000	0	Landfill
Facility	Solid	Construction	Building Materials (Wood, Lumber)	90,000	90,000	Landfill
Facility	Solid	Construction	Scrap Metals (Pipe, Steel, Hardware)	80,000	80,000	Metal Recycling
Facility	Solid	Construction	Plastics (Packaging/ Containers)	30,000	30,000	Recycling & Landfill
Facility	Solid	Construction	Oily Rags and/or Absorbents	350	350	Hazardous Waste Facility
Facility	Solid	Construction	Excavated Soils/Boulders	40,430,000	40,430,000	Landfill
Facility	Solid	Construction	Spent Sand-Blasting Media	N/A	N/A	Landfill
Facility	Solid	Construction	Concrete (Washout)	150,000	150,000	Landfill
Wastewater Line	Solid	Construction	Packing/Cut Pipe Pieces	N/A	500	Landfill
Waterline	Solid	Construction	Ductile Iron Pipe Waste	N/A	2,000	Recycle
Waterline	Solid	Construction	Packing Materials (Wood Spacers/ Pallets/	N/A	2,000	Landfill

TABLE 1-17
Avocado Site Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Avocado Site Alternative Estimated Total (Pounds)	Disposal Method
			Cardboard Boxes)			
Facility	Liquid	Construction	Paints	100	100	Hazardous Waste Facility
Facility	Liquid	Construction	Solvents	35	35	Hazardous Waste Facility
Facility	Liquid	Construction	Lubricating Oils	70	70	Hazardous Waste Facility
Facility	Liquid	Construction	Water	300,000	300,000	Drain On site
Pipeline	Liquid	Construction	Hydrotest Water	N/A	392,000 (47,000 gallons)	Drain to Sewer
Waterline	Liquid	Construction	Hydrotest Water	N/A	100,080 (12,000 gallons)	Drain to Sewer
Facility	Gas	Construction	Natural Gas	N/A	N/A	To Atmosphere
Facility	Gas	Construction	Nitrogen	250	250	To Atmosphere
Facility	Solid	Construction	Asbestos Containing Material	N/A	N/A	None for New Construction
Facility	Solid	Construction	Lead Containing Material	N/A	N/A	None for New Construction

Notes: VCM = Ventura Compressor Station Modernization; N/A = not applicable.

Operations and Maintenance Phase

The preliminary quantities for solid waste and wastewater for the Avocado Site Alternative during operation and maintenance are estimated in Table 1-18, below (originally from Table 5.19-6 in the PEA). The assumption is that the quantities of waste for the Avocado Site Alternative during operation and maintenance would remain the same as for the VCM Project.

TABLE 1-18
Avocado Plant Operation Waste Estimates

Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total	Avocado Site Alternative Estimated Total	Disposal Method
Solid	Plant Operation	Plastics (Packaging/Containers)	10 Pounds per Month	10 Pounds per Month	Hazardous Waste Facility
Liquid	Plant Operation	Oily Rags and/or Absorbents	10 Pounds per Month	10 Pounds per Month	Hazardous Waste Facility
Liquid	Plant Operation	Solvents	10 Pounds per Month	10 Pounds per Month	Hazardous Waste Facility
Liquid	Plant Operation	Lubricating Oils	100 Gallons Per Month	100 Gallons per Month	Hazardous Waste Facility
Liquid	Plant Operation	Industrial Water	700 Gallons per Month	700 Gallons per Month	Hazardous Waste Facility

1.11.3 Provide a description of existing stormwater infrastructure for each alternative site.

RESPONSE

A description of the existing stormwater infrastructure for the Avocado Site is shown on the photo in Exhibit 1-15 below.



Exhibit 1-15: West-facing view of the Avocado Site (via aerial photography, March 2022)

As seen in Exhibit 1-15, the Avocado Site appears to be an undeveloped agricultural area with light vegetation. No stormwater infrastructure (e.g., curbs, gutters, storm drain inlets) was observed in the vicinity of the site. No water infrastructure (e.g., fire hydrants, fire department connections, valve boxes) was observed in the vicinity of the site. The assumption has been made that a water main and sewer main exist along West Main Street, approximately 2.27 miles to the south of the Avocado Site, where a connection would be made for water and sewer services. Further site evaluation will be needed to confirm the locations of these connection points.