
Attachment 3
Ventura Steel 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 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 Ventura Steel Site only. Please refer to Attachment 1 for responses related to the Avocado Site and Attachment 2 for responses related to the Devil's Canyon Road Site.

SoCalGas's General Approach for Ventura Steel Site Alternative

SoCalGas' 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 in the three site alternatives and includes 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, because 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 will strive to provide the information requested on the environmental conditions to support the comparative analysis of effects for each alternative.

3.1 General Information About Site Alternatives

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

The Ventura Steel Site is located approximately 7,000 feet north of the existing Ventura Compressor Station property within the County of Ventura. The Ventura Steel Site Alternative is relatively flat, and within an industrial area. The site currently includes existing active oilfield operation, pipe storage and staging yard that would impact the site development.

The Ventura Steel Site has direct access from Highway 33 to the Shell Road interchange and North Ventura Avenue. Considering that there is an active oil operation at this site, it is assumed that there are existing fire water system and sanitary sewer along East Shell Road that the site can connect and tie-in to. The nearest electrical interconnection is through an existing Southern California Edison (SCE) Canet 16 kilovolt circuit.

The Ventura Steel Site Alternative consists of (1) installing two new 1,900 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 a new gas pipeline system consisting of two suction and two discharge pipelines with a total of approximately 8.3 miles of new pipeline along the foot of the hills that would tie into the existing natural gas system pipelines; (7) installing new water and sewer lines that would tie into the existing facilities at East Shell Road; and (8) installing aboveground one new electrical pole to tie-in the existing SCE Canet circuit.

The Ventura Steel Site Alternative would require the demolition of on site existing oilfield infrastructure, as well as the abandonment of oil wells within the proposed facility boundary.

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 3.1.1–3.1.4):

3.1.1 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 39.5 acres. The temporary disturbance area, which only applies to off-site infrastructure, is about 5.6 acres. These values are approximations based on conceptual engineering and will need to be validated and updated in later phases of design.

The permanent and temporary disturbance area boundaries can be viewed on Ventura Steel Site Drawing 152084-7039-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, waterline, 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 3-A for a PDF of Ventura Steel Site Drawing 152084-7039-D-SKT and Attachment 3-A for KMZ and SHP files.

3.1.2 Electric interconnections and modifications to existing electric distribution facilities.

RESPONSE

The proposed facility on the Ventura Steel Site would receive power from the existing SCE Canet circuit and is based on a preliminary study that entails the installation of 1 new electrical pole and a 140 foot alignment off North Ventura Avenue to deliver power to the Ventura Steel Site. No electrical substation is required for this alternative. See the Ventura Steel Site Drawing 152084-7037-D-SKT, Conceptual Utility Plan, for the electrical line alignment and assumed tie-in location and Ventura Steel Site Drawing 152084-5501-D-SKT, Electrical Distribution Interconnect Preliminary Details, for the electrical details. The Ventura Steel Site Drawing 152084-3003-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 3-B), SCE is currently progressing on making substation upgrades to the existing electrical system and at this time, SCE does not anticipate any modifications to its distribution system to serve the requested load at the Ventura Steel Site.

Please refer to Appendix 3-A for Ventura Steel Site Drawings 152084-7037-D-SKT, 152084-5501-D-SKT, 152084-3003-D-SKT, the Conceptual Utility Plan, Electrical Distribution

Interconnect Preliminary Details, and Conceptual Plot Plan, respectively. Refer to Appendix 3-B for the electrical interconnections detailed in the SCE Engineering Analysis Report for the Ventura Steel Site.

3.1.3 Natural gas transmission system pipeline modifications.

RESPONSE

The proposed facility at the Ventura Steel Site would include two new 20-inch-diameter suction pipelines approximately 3.5 miles long and two new 20-inch-diameter discharge transmission pipeline installations approximately 4.8 miles long. These installations would require suction gas flow from existing transmission pipelines to the Ventura Steel Site and discharge flow from the Ventura Steel Site to the existing Ventura Compressor Station. See Ventura Steel Site Drawing 152084-7037-D-SKT, Conceptual Utility Plan, and Drawing 152084-7701-D-SKT, Pipeline Route Plan, for the pipeline alignment and assumed tie-in locations. Ventura Steel Site Drawings 152084-7702-D-SKT, 152084-7703-D-SKT, and 152084-7704-D-SKT detail a section cut of a typical gas pipeline trench, including bedding, backfill, and surface recommendations.

Please refer to Appendix 3-A for Ventura Steel Site Drawings 152084-7701-D-SKT, 152084-7037-D-SKT, 152084-7702-D-SKT, 152084-7703-D-SKT, and 152084-7704-D-SKT, which detail the natural gas pipeline alignment and assumed tie-in locations for the Ventura Steel Site.

3.1.4 Other utilities, such as water and wastewater.

RESPONSE

Per Aera Energy LLC letter,² the Ventura Steel Site is an active pipe storage and staging yard and is currently used to support Aera's ongoing oilfield operations. It is assumed the facility would connect to an existing water main at two locations along East Shell Road to accommodate fire protection and potable water needs. See the Ventura Steel Site Drawing 152084-7037-D-SKT, Utility Plan, for the waterline alignment and assumed tie-in locations.

It is assumed the facility will connect to an existing sewer main along East Shell Road. See the Ventura Steel Site Drawing 152084-7037-D-SKT, Utility Plan, for the sewer line alignment and assumed tie-in location.

Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-7037-D-SKT, which details the Conceptual Utilities Plan, and Ventura Steel Site Drawing 152084-7101-D-SKT, Conceptual Utility Trench Details, which details a section cut of a typical water and wastewater trench, including bedding, backfill, and surface recommendations.

² Manatt, Phelps & Phillips Letter to CPUC, Aera Energy LLC Scoping Comments on Ventura Compressor Modernization Project (CPCN Application No. A.23-08-019), dated May 13, 2025, available at [VCM_ScopingComments_05-19-2025.pdf](#), pp. 60–63.

3.1.5 Access road improvements, including paving.

RESPONSE

No new access roads would be needed for the Ventura Steel Site. Ventura Steel Site Drawing 152084-7035-D-SKT, Conceptual Site Surfacing Plan, provides the site paving details.

Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-7035-D-SKT, which provides site paving details.

For each of the site alternatives, please confirm whether the following proposed “site improvements” would need to be included (see Responses to Sections 3.1.6–3.1.11):

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

RESPONSE

The PDC building would need to be included in the facility at the Ventura Steel Site. Similar to the VCM Project, the PDC building would serve as the center for receiving electrical power from the SCE feed and distributes it to various equipment that is part of the project. The electrical load at the Ventura Steel Site is anticipated to be similar to the VCM Project. Based on the preliminary layouts and the available information, it was verified that a 1,500 square feet PDC building would be needed to meet the Ventura Steel Site requirements. The Ventura Steel Site Drawing 152084-3003-D-SKT, “Conceptual Plot Plan,” shows the location of the PDC building within the facility boundary.

The Ventura Steel Site would include the site improvement listed above. Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-3003-D-SKT, which provides the Conceptual Plot Plan for the Ventura Steel Site improvements.

3.1.7 Office building and warehouse.

RESPONSE

The office building and warehouse would both need to be included in the facility at the Ventura Steel 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. The Ventura Steel Site Drawing 152084-3003-D-SKT, Conceptual Plot Plan, shows the location of the office building and warehouse.

The Ventura Steel Site would include the site improvement listed above. Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-3003-D-SKT, which provides the Conceptual Plot Plan for the Ventura Steel Site improvements.

3.1.8 Standby generator with enclosure

RESPONSE

The standby generator with an enclosure would need to be included in the facility at the Ventura Steel Site. The proposed natural gas standby generator at the Ventura Steel Site would be the same size and equipment model as the VCM Project (see Response to Section 3.3.2 below). There are, however, minor differences between the Ventura Steel Site Alternative and the VCM Project, such as the addition of a fire water pump at the Ventura Steel Site. This is not significant and therefore this would not change the size of the proposed standby generator. Ventura Steel Site Drawing 152084-3003-D-SKT, Conceptual Plot Plan, shows the location of the standby generator inside the facility.

The Ventura Steel Site would include the site improvement listed above. Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-3003-D-SKT, which provides the Conceptual Plot Plan for the Ventura Steel Site improvements.

3.1.9 New storage tanks

RESPONSE

The storage tanks in the VCM Project would also need to be included in the facility at the Ventura Steel Site. The storage tanks required for both the VCM Project and the facility at the Ventura Steel Site include an oily waste storage drum, engine oil storage drum, waste oil storage drum, condensate drip drum, coolant storage drum, compressor area oily waste tank, and compressor area oil waste tank. The Ventura Steel Site Drawing 152084-3003-D-SKT, Conceptual Plot Plan, shows the location of each of these tanks inside the facility.

The Ventura Steel Site would include the site improvement listed above. Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-3003-D-SKT, which provides the Conceptual Plot Plan for the Ventura Steel Site improvements.

3.1.10 Perimeter fencing, gate, and security features

RESPONSE

The perimeter fencing, gate, and security features would be included in the facility at the Ventura Steel Site. The entire site would be surrounded by an 8 feet tall masonry security wall. The site would have a 30 feet wide sliding metal gate with card reader in the middle of the south wall of the site for primary access and a separate metal gate for pedestrian access. Another 15 feet wide metal gate would be located at the southeast corner of the site for additional access as needed. Ventura Steel Site Drawing 152084-3003-D-SKT, Conceptual Plot Plan, shows the location of the security wall, site access gates, and security features.

The Ventura Steel Site would include the site improvement listed above. Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-3003-D-SKT, which provides the Conceptual Plot Plan for the Ventura Steel Site improvements.

3.1.11 Site paving.**RESPONSE**

The Ventura Steel Site would require finished grading and site paving including areas requiring asphalt or aggregate surfacing. The Ventura Steel Site has some existing structures, and it is assumed that demolition of these structures is required. Ventura Steel Site 152084-7035-D-SKT, Conceptual Site Surfacing Plan, shows the site surfacing features included.

The Ventura Steel Site would include the site improvement listed above. Please refer to Appendix 3-A for Ventura Steel Site Drawing 152084-7035-D-SKT, which details the site surfacing plan for the Ventura Steel Site.

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

3.1.12 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 Ventura Steel Site would include the additional phases and equipment that are highlighted in grey in Table 3-1, below. Construction of the Ventura Steel Site would require a greater number of workdays to complete soil remediation and well abandonment phases, as well as off-site infrastructure construction, when compared to the VCM Project. All remaining phases would be the same as for the VCM Project.

Please refer to Appendix 3-C, Air Quality and Greenhouse Gas Emissions Analysis of Ventura Steel Site, for further detail on the information provided in this response.

TABLE 3-1
Ventura Steel 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
		Bore/Drill Rigs	300	1	Diesel	(8)	0.5
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	Well Abandonment (Building Construction)	Other General Industrial Equipment	200	3	Diesel	[8]	0.29
		Graders	200	1	Diesel	[8]	0.74

TABLE 3-1
Ventura Steel Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
		Bore/Drill Rigs	550	1	Diesel	(8)	0.37
		Excavators	250	2	Diesel	[8]	0.38
		Cranes	320	3	Diesel	[7]	0.29
		Pumps	550	2	Diesel	[8]	0.74
		Other Construction Equipment	115	2	Diesel	[8]	0.42
		Bore/Drill Rigs	450	1	Diesel	(8)	0.5
		Off-Highway Trucks	320	3	Diesel	(8)	0.38
		Welders	50	3	Diesel	[8]	0.45
A4	Off-site Laydown Development (Site Preparation)	Cranes	275	1	Diesel	[7]	0.29
		Forklifts	74	1	Diesel	[8]	0.2
		Tractors/Loaders/Backhoes	225	1	Diesel	[7]	0.37
		Welders	24	4	Diesel	[8]	0.45
		Excavators	443	1	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	84	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Air Compressors	2	1	Diesel	[6]	0.48
		Forklifts	82	1	Diesel	[8]	0.2
		Generator Sets	49	4	Diesel	[8]	0.74
		Excavators	45	1	Diesel	[8]	0.38
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Air Compressors	10	1	Diesel	[6]	0.48
A5	Gas Pipeline Installation (Building Construction)	Excavators	346	8	Diesel	[8]	0.38
		Concrete/Industrial Saws	261	8	Diesel	[8]	0.73
		Rubber-Tired Dozers	363	2	Diesel	[8]	0.4
		Other Construction Equipment	319	8	Diesel	[8]	0.42
		Other Construction Equipment	109	1	Diesel	[8]	0.42
		Welders	24	4	Diesel	[8]	0.45
		Graders	250	1	Diesel	[8]	0.41
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	74	2	Diesel	[7]	0.37

TABLE 3-1
Ventura Steel Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
		Tractors/Loaders/Backhoes	350	3	Diesel	[7]	0.37
		Skid Steer Loaders	65	3	Diesel	(8)	0.37
		Bore/Drill Rigs	173	1	Diesel	(8)	0.5
		Other General Industrial Equipment	23	3	Diesel	[8]	0.34
		Generator Sets	22	3	Diesel	[8]	0.74
A6	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	Subsurface Exploration (Site Preparation)	Tractors/Loaders/Backhoes	107	1	Diesel	[8]	0.37
		Excavators	45	1	Diesel	[8]	0.38
		Air Compressors	2	1	Diesel	[6]	0.48
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[8]	0.37
		Bore/Drill Rigs	300	1	Diesel	(8)	0.5
2	Demolition (Aera Buildings & Foundations) (Demolition A)	Concrete/Industrial Saws	33	1	Diesel	[8]	0.73
		Tractors/Loaders/Backhoes	107	1	Diesel	[8]	0.37
		Excavators	45	1	Diesel	[8]	0.38
		Air Compressors	2	1	Diesel	[6]	0.48
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[8]	0.37
		Skid Steer Loaders	65	1	Diesel	(8)	0.37
3	Site Preparation/ Rough Grading (Grading)	Excavators	45	1	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	107	1	Diesel	[8]	0.37
		Air Compressors	2	1	Diesel	[6]	0.48
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
4	Foundations (Building Construction)	Air Compressors	10	1	Diesel	[6]	0.48
		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 3-1
Ventura Steel 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 (Building Construction)	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
		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

TABLE 3-1
Ventura Steel Site Off-Road Construction Equipment

	Phase Name	Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours per Day ^c	Load Factor ^d
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
12	Decommissioning/ Demolition (Demolition B)	Welders	24	2	Diesel	[8]	0.45
		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
		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 EPA 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.

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

RESPONSE

The construction of the Ventura Steel Site would include the additional phases that are highlighted in grey in Table 3-2, below. Construction of the Ventura Steel Site Alternative would require a greater number of workdays to complete soil remediation and well abandonment phases, as well as off-site infrastructure construction, compared to the VCM Project. All remaining phases would be the same as for the VCM Project.

Please refer to Appendix 3-C, Air Quality and Greenhouse Gas Emissions Analysis of Ventura Steel Site, from which the information provided in this response was obtained.

TABLE 3-2

Ventura Steel Alternative Preliminary Construction Schedule by Phase

Phase Number	Phase Description	Phase Start Date	Phase End Date	Work Days per Phase
A1	Site Assessment	5/1/2029	5/18/2029	14
A2	Soil Remediation	6/3/2030	11/4/2030	111
A3	Well Abandonment	8/16/2029	3/31/2031	423
A4	Off-site Laydown Development	4/1/2036	6/4/2036	47
A5	Gas Pipeline Installation	4/1/2036	4/13/2037	270
A6	Electrical Interconnect	12/12/2036	12/29/2036	12
1	Subsurface Exploration	4/1/2036	6/4/2036	47
2	Demolition (Aera Buildings & Foundations)	6/5/2036	9/5/2036	67
3	Site Preparation/Rough Grading	8/13/2036	9/5/2036	18
4	Foundations	9/8/2036	5/7/2037	174
5	Trenching/Undergrounds	4/8/2037	6/26/2037	58
6	Equipment, Structural Steel & Building Erection, Piping	1/13/2037	11/11/2037	217
7	Electrical & Instrumentation	10/13/2037	8/30/2038	230
8	Paving	8/31/2038	10/27/2038	42
9	Painting/Insulation	9/29/2038	11/24/2038	41
10	Commissioning/Startup and Testing	8/31/2038	2/10/2039	118
11 ^a	Post Construction/Site Restoration	2/11/2039	3/14/2039	22
12 ^b	Decommissioning/Demolition ^a	2/13/2040	5/15/2040	67

Notes:

- No offroad equipment are expected to be used for Phase 11; however, approximately 50 percent of equipment hauling for demobilization will be taking place during Phase 11.
- Decommissioning and demolition is assumed to be completed approximately 1 year after the new replacement compressors are fully operational and would involve removal of the existing compressors at the current site.

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

RESPONSE

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

TABLE 3-3

Estimated Quantities of Imported and Exported Materials for the Ventura Steel Site Alternative

	Fill Quantity (CY)	Excavated Quantity (CY)	Import (CY)	Export (CY)
On site (Facility, Foundations)	19,409	25,334	7,158	N/A
Off site (Pipeline, Road, Waterline, Sewer, Electrical)	20,283	37,731	N/A	13,983
Soil Remediation – On site	N/A	13,083	N/A	13,083
Soil Remediation – Off site	N/A	3,465	N/A	3,465
Total Import/Export			7,158	30,531

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

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 re-compaction.

On-site construction would require approximately 25,334 cubic yards (CY) of excavation and approximately 19,409 CY of fill. However, approximately 13,083 CY of on-site soils is potentially impacted by contamination, leaving an on-site earthwork import quantity of approximately 7,158 CY.

Off-site infrastructure would require approximately 37,731 CY of excavation and approximately 20,283 CY of fill. However, approximately 3,465 CY of off-site soils is estimated to be impacted, leaving an off-site earthwork with an export quantity of approximately 13,983 CY.

Based on the Desktop Hazards Assessment for VCM Project – Ventura Steel Site, it is estimated that approximately 13,083 CY of soils within the compressor station area (on site) is impacted due to the tank farm operations, the presence of oil wells, etc. It is also estimated that approximately 3,465 CY of soils within the roadway/utility corridor is potentially impacted due to small and large tanks, sumps, and oil wells (Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site, Section 9).

In total, the Ventura Steel Site Alternative would require approximately 7,158 CY of import of soil for the entire Ventura Steel Site Alternative and approximately 30,531 CY of export for both on-site and off-site infrastructure.

Please refer to Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site, for relevant earthwork details and potential for contaminated soils.

3.1.15 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 VCM Project.

RESPONSE

The construction of the Ventura Steel Site would include additional phases of construction compared to the VCM Project, which would require additional construction workers and vendors as highlighted in grey in Table 3-4, below. Construction of the Ventura Steel Site Alternative would require a greater number of workdays to complete soil remediation and well abandonment phases, as well as off-site infrastructure construction, when compared to the VCM Project. All remaining phases would be the same as for the VCM Project.

Please refer to the Appendix 3-C for the Air Quality and Greenhouse Gas Emissions Analysis of Ventura Steel Site, for further detail on the information provided in this response.

TABLE 3-4
Ventura Steel 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	12	10	LDA, LDT1, LDT2
		Vendor	8	10	HHDT, MHDT
A2	Soil Remediation	Worker	18	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT
		Hauling	20	46	HHDT
A3	Well Abandonment	Worker	9	10	LDA, LDT1, LDT2
		Vendor	18	10	HHDT, MHDT
		Hauling	24	44	HHDT
A4	Off-site Laydown Development	Worker	12	10	LDA, LDT1, LDT2
		Vendor	20	10	HHDT, MHDT
A5	Gas Pipeline Installation	Worker	135	10	LDA, LDT1, LDT2
		Vendor	20	10	HHDT, MHDT
		Hauling	8	45	HHDT

TABLE 3-4
Ventura Steel Site Alternative Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
A6	Electrical Interconnect	Worker	11	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT
		Hauling	8	45	HHDT
1	Subsurface Exploration	Worker	28	10	LDA, LDT1, LDT2
		Vendor	8	10	HHDT, MHDT
		Hauling	5	44	HHDT
2	Demolition (Aera Buildings & Foundations)	Worker	12	10	LDA, LDT1, LDT2
		Vendor	8	10	HHDT, MHDT
		Hauling	5	45	HHDT
3	Site Preparation/Rough Grading	Worker	30	10	LDA, LDT1, LDT2
		Vendor	10	10	HHDT, MHDT
		Hauling	52	44	HHDT
4	Foundations	Worker	68	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	10	44	HHDT
5	Trenching/Undergrounds	Worker	46	10	LDA, LDT1, LDT2
		Vendor	2	10	HHDT, MHDT
		Hauling	9	44	HHDT
6	Equipment, Structural Steel & Building Erection, Piping	Worker	78	10	LDA, LDT1, LDT2
		Vendor	22	10	HHDT, MHDT
		Hauling	1	44 (298)	HHDT
7	Electrical & Instrumentation	Worker	36	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	1	44	HHDT
8	Paving	Worker	22	10	LDA, LDT1, LDT2
		Hauling	12	44	HHDT
9	Painting/Insulation	Worker	4	10	LDA, LDT1, LDT2

TABLE 3-4
Ventura Steel Site Alternative Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
		Hauling	9	44	HHDT
10	Commissioning/Startup and Testing	Worker	28	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT
		Hauling	3	44	HHDT
11	Post Construction/Site Restoration	Hauling	14	44	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 Ventura Steel Site to the County Line for criteria pollutant emissions since the trip destinations/directions are not known. The second value in italics is the one-way hauling distances from the Ventura Steel 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 (~44 miles), since only one hauling entry is allowed per phase in CalEEMod, the haul distances were calculated using a weighted average of the distances. For example, for Phase A5, which includes 3 trips to the landfill and 5 equipment delivery trips, a total of 8 trips was entered, with a weighted average distance of 45 miles.
- Hauling trip mileage for Phase 12 (i.e., Decommissioning/Demolition) is CalEEMod default.

3.1.16 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 anticipated earthwork activities for the Ventura Steel Site Alternative are divided into two categories: (1) the oil well abandonment and soil remediation activities and (2) the construction activities.

Oil Well Abandonment and Soil Remediation

The following paragraphs describe the oil well abandonment and soil remediation activities that would be associated with earthwork quantities.

The Ventura Steel Site would require 26 existing oil wells to be plugged and abandoned before demolition of the existing components associated with oil production equipment. This does not account for any additional existing underground infrastructure/piping. As such, future site investigations would need to be completed.

The Ventura Steel Site compressor station location is estimated to require remediation of soils impacted from the historical and ongoing use of the site for oil and gas operations (Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site). Additionally, the roadway/utility corridor is anticipated to be impacted from long-term agricultural use and a known nearby release of volatile organic compounds (Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site) and is anticipated to require remedial activities.

Construction Activities

The following paragraphs describe the construction activities that would be associated with earthwork quantities.

Demolition of Existing Infrastructure

The Ventura Steel Site would require the demolition of existing structures including, but not limited to, oil production equipment, structures, and foundations.

Temporary Staging Area

The Ventura Steel Site would require a temporary staging area that would be stripped and prepared for use by workers and material deliveries. There are 7 existing wells located within the construction staging area. Since this is temporary, it is assumed they would not be required to be decommissioned.

Natural Gas Transmission Pipelines

The Ventura Steel Site would require new natural gas transmission pipelines, that include two suction and two discharge pipes, which would tie into the main transmission pipelines.

Southern California Edison (SCE) Electrical Interconnection

The Ventura Steel Site compressor station would receive power from the existing SCE Canet circuit. The Ventura Steel Site Alternative would include installation of a new pole to connect to an existing SCE electrical line located outside the facility boundary along Ventura Avenue.

Water and Sewer

The Ventura Steel Site would require installation of new water and wastewater lines. It is assumed the connection to the existing services would be located along East Shell Road.

Earthwork

The earthwork for the Ventura Steel Site Alternative would consist of Stormwater Pollution Prevention Plan (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 3-5, below.

TABLE 3-5
Anticipated Earthwork Volumes

Item No.	Description	Volume (CY) Ventura Steel Site	Volume (CY) VCM Project Site
1	Site Excavation	7,559	1,907
2	Site Fill	7,559	3,400
3	Roadway Excavation	N/A	0*
4	Roadway Fill	N/A	0*
5	Wastewater Line Excavation	140	0*
6	Wastewater Line Bedding	28	0*
7	Wastewater Line Backfill	112	0*
8	Waterline Excavation	516	0*
9	Waterline Bedding	103	0*
10	Waterline Backfill	412	0*
11	Foundation Excavation	17,775	17,250
12	Foundation Backfill	11,850	11,500
13	Pipeline Excavation	37,071	0*
14	Pipeline Bedding	2,696	0*
15	Pipeline Backfill	30,455	0*
16	Electrical Interconnect Excavation	4	0*
17	Electrical Interconnect Backfill	N/A	0*
18	Oil Well Abandonment- Excavation	765	0*
19	Oil Well Abandonment- Backfill	1,156	0*
20	Soil Remediation	16,548	0*

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

* Off-site infrastructure or oil well abandonment impact is not applicable to the VCM project.

Please refer to Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site, for information on the anticipated soil remediation due to oil and gas operations on the Ventura Steel Site.

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

3.1.17 Site photos.

RESPONSE

The following photos were taken by SoCalGas and Burns & McDonnell in April 2025 from publicly accessible areas or from land with SoCalGas access rights to assess site conditions.



Exhibit 3-1: View of the Ventura Steel Site looking west from East Shell Road



Exhibit 3-2: North-facing view of Ventura Steel Pipeline Alignment from School Canyon Road



Exhibit 3-3: North-facing view of the gate/entrance to the existing Aera facility at the Ventura Steel Site from East Shell Road



Exhibit 3-4: Northwest-facing view of the existing conditions at the Ventura Steel Site from East Shell Road



Exhibit 3-5: West-facing view of the existing Ventura Steel Site and East Shell Road



Exhibit 3-6: North-facing view of existing conditions at the Ventura Steel Site



Exhibit 3-7: Northeast-facing view of existing oil wells and associated piping at the Ventura Steel Site



Exhibit 3-8: Existing south-side boundary conditions at the Ventura Steel Site



Exhibit 3-9: Northeast-facing view of existing conditions at the Ventura Steel Site



Exhibit 3-10: West-facing view of existing conditions on East Shell Road
at the Ventura Steel Site



Exhibit 3-11: Fire hydrant on the south side of East Shell Road



Exhibit 3-12: Fire department connection on the south side of East Shell Road, showing potential fire water main connection



Exhibit 3-13: Existing valve vault on the Ventura Steel Site



Exhibit 3-14: Existing site grading at the Ventura Steel Site



Exhibit 3-15: Existing grading at the Ventura Steel Site



Exhibit 3-16: Existing conditions at the southwest corner of the Ventura Steel Site



Exhibit 3-17: Storm drain inlets at the intersection of Ventura Steel Road and East Shell Road



Exhibit 3-18: North-facing view of Ventura Steel Road and connection point for site electrical



Exhibit 3-19: Existing gate/entryway into the Aera facility at the Ventura Steel Site



Exhibit 3-20: Existing conditions at the Ventura Steel Site's temporary staging area



Exhibit 3-21: Existing conditions at the Ventura Steel Site's temporary staging area



Exhibit 3-22: Existing conditions at the Ventura Steel Site's temporary staging area

The following aerial pictures were taken by SoCalGas in March 2022 for the purposes of the Feasibility Study that was requested by the CPUC in August 2021.



Exhibit 3-23: Northeast-facing view of the existing Ventura Steel Site

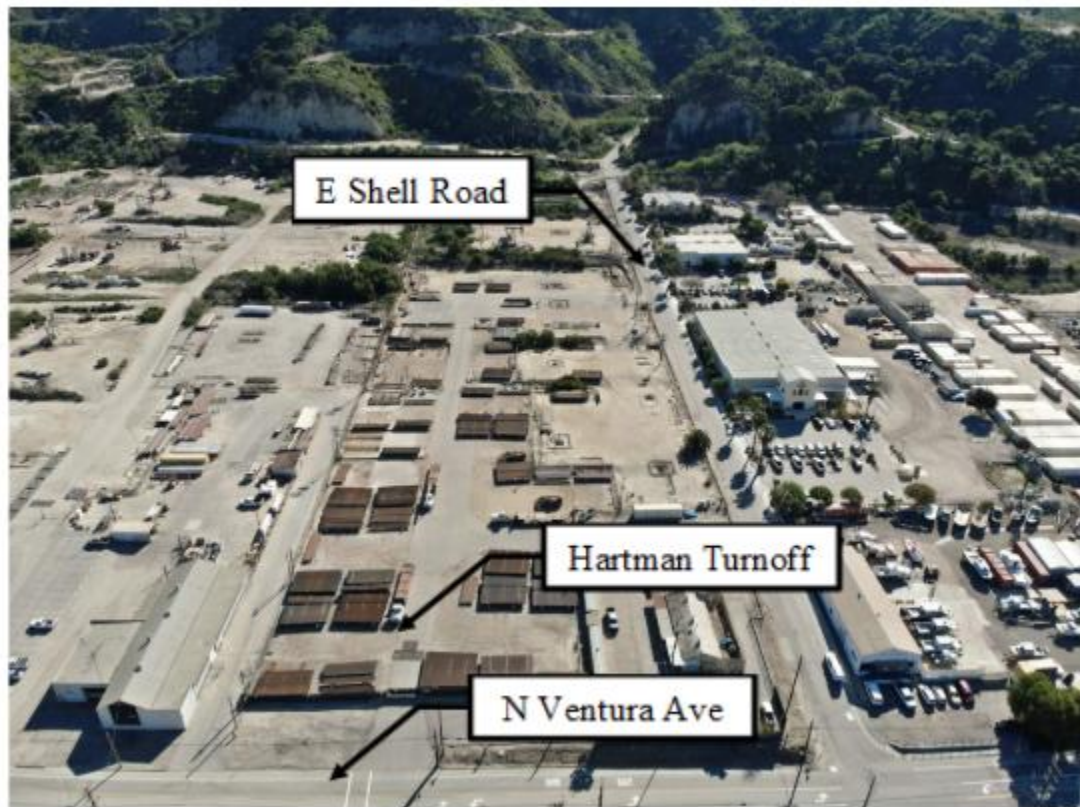


Exhibit 3-24: East-facing view of the existing Ventura Steel Site



Exhibit 3-25: Northeast-facing view of the existing Ventura Steel Site and its temporary staging area

3.1.18 Topographic maps.

RESPONSE

For the topographic maps for the Ventura Steel Site, please refer to Appendix 3-A for Ventura Steel Site Drawings 152084-7036-D-SKT, Conceptual Grading Plan, and 152084-7038-D-SKT, Conceptual Topographic Map.

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

RESPONSE

The Ventura Steel Site is located just north of East Shell Road and south of Hartman Turnoff (Exhibit 3-26). The photo in Exhibit 3-26 was taken by SoCalGas in 2022.



Exhibit 3-26: East-facing view of the Ventura Steel Site

Per the Aera Energy LLC letter,³ the Ventura Steel Site is an active pipe storage and staging yard and is currently used to support Aera’s ongoing oilfield operations.

The existing surface condition consists of compacted dirt and loose fill, with a stepped grading configuration, that generally slopes down from east to west. There are visible signs of rough grading, including track marks and irregular soil compaction, throughout the Ventura Steel Site. The southern side of the Ventura Steel Site along E Shell Road consists of deteriorated asphalt pavement and in several areas, the asphalt surface has gradually disintegrated, exposing a subsurface of compacted dirt and base aggregate. Overall, the site does not contain any formal pavement or surfacing. See Exhibits 3-27 and 3-28 for existing conditions at the Ventura Steel Site. The photographs in Exhibits 3-27 and 3-28 were taken by SoCalGas in April 2025 from publicly accessible areas).

³ Manatt, Phelps & Phillips Letter to CPUC, Aera Energy LLC Scoping Comments on Ventura Compressor Modernization Project (CPCN Application No. A.23-08-019), dated May 13, 2025, available at [VCM_ScopingComments_05-19-2025.pdf](#), pp. 60–63.



Exhibit 3-27: Existing conditions at the Ventura Steel Site



Exhibit 3-28: Existing conditions at the Ventura Steel Site

There is a partially exposed concrete valve pit at the southern side of the Ventura Steel Site. Within the pit are semi-buried hand-operated valves and pipes, which appear to be inactive. Overall, the valve pit appears to be a remnant of a former industrial facility and does not appear to be in use. See Exhibit 3-29 for a photo of the valve pit. The photograph shown in Exhibit 3-29 was taken by SoCalGas in 2025 from a publicly accessible area.



Exhibit 3-29: Existing valve pit at the Ventura Steel Site

The Ventura Steel Site has substantial well infrastructure that would have impacts on site development. According to California Geology Energy Management Division (CalGEM) records, there are 26 existing oil wells within the facility boundary.

The Ventura Steel Site also has some miscellaneous aboveground items including some piping appurtenances attached to several of the oil wells, chemical totes, an oil-cooled distribution transformer, electrical poles, uninstalled pipe, and wooden beams. See Exhibit 3-30 for an aerial photo of the Ventura Steel Site, taken in 2022 by SoCalGas.



Exhibit 3-30: East-facing view of the Ventura Steel Site

There are two fire hydrants and one fire department connection on the south side of East Shell Road. The fire department connection is 6 inches in diameter. It is assumed that the main line that runs along East Shell Road is at a minimum of 6 inches in diameter. See Exhibits 3-31 and

3-32 for the existing fire department connection and hydrant on the south side of the Ventura Steel Site. Photography was conducted by SoCalGas in 2025 from publicly accessible areas.



Exhibit 3-31: Fire department connection on the south side of Ventura Steel Site



Exhibit 3-32: Fire hydrant on the south side of Ventura Steel Site

The Ventura Steel Site is located approximately 1.5 miles north of the VCM Project Site and approximately 1 mile from the nearest transmission pipeline. A pipeline corridor consisting of two suction and two discharge pipelines would have to be constructed to tie this alternative into the existing transmission pipeline infrastructure. Exhibit 3-33 shows a section of the proposed pipeline alignment. As the picture depicts, there are other pipelines and infrastructure in the area that would need to be worked around or relocated to safely construct and operate the system. Exhibit 3-34 shows the existing electrical infrastructure and proposed connection point to the Ventura Steel Site.



Exhibit 3-33: North-facing view of the Ventura Steel Pipeline Alignment from School Canyon Road



Exhibit 3-34: North-facing view of Ventura Steel Road and connection point for site electrical

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

RESPONSE

The Ventura Steel Site is in a developed area of Ventura County and on a site that would require minimal cut/fill and grading activities. The Ventura Steel Site appears to have adequate existing utility infrastructure surrounding the site and would accommodate short tie-in lateral runs for water, sewer, and electrical connections.

The unique activities for Ventura Steel Site are as follows:

- The site has existing structures, foundations, and potential underground utilities that would need to be demolished. Additional site investigation will be needed to understand the extent of demolition required, particularly for subsurface infrastructure.
- The site has substantial oil well infrastructure that would impact site development. According to CalGEM records, there are 26 existing oil wells within the facility boundary. SoCalGas would coordinate with CalGEM and the County of Ventura to plug and abandon the well infrastructure as necessary to accommodate the new facility. Site investigation is needed to evaluate the extent of oil well infrastructure. For the location showing the existing oil wells and the preliminary facility equipment arrangement, see Ventura Steel Site Drawing 152084-3005-D-SKT, Conceptual Plot Plan with Wells.
- The Ventura Steel Site is approximately 1.5 miles from the existing facility and would require the installation of new gas supply and discharge pipelines, and the acquisition of additional pipeline right-of-way. The Ventura Steel Site would include two new 20-inch diameter suction pipelines approximately 3.5 miles long and two new 20-inch diameter discharge transmission pipeline installations approximately 4.8 miles long. The proposed pipeline alignment would run south from the Ventura Steel Site along the base of the mountain on the eastern side of the city. Details on the gas pipelines and the other utilities can be found in Ventura Steel Site Drawing 152084-7701-D-SKT, Conceptual Pipeline Route Plan.
- The proposed compressor station location is estimated to require remediation of approximately 13,083 CY of soils impacted from the historical and ongoing use of the site for oil and gas operations (Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site, Section 9.1). Additionally, approximately 3,465 CY of soil would be impacted with the roadway/utility corridor, which would be impacted from long-term oil and gas operations use and a known nearby release of volatile organic compounds (Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site, Section 9.2).

Please refer to Appendix 3-D, Desktop Hazards Assessment for VCM Project – Ventura Steel Site, and Appendix 3-A for Ventura Steel Site Drawings 152084-3005-D-SKT, Conceptual Plot Plan with Wells, and 152084-7701-D-SKT, Conceptual Pipeline Route Plan.

3.1.21 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 3-E for the PDF of the updated mailing list for all the features and off-site infrastructure for the Ventura Steel Site. The Excel file of the mailing list is included as Attachment 3-B.

3.2 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 Ventura Steel 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 Ventura Steel Site Alternative's features and any related landform alteration. Public visibility of the 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, the four key observation points, or "views," were selected, as listed below and shown on Exhibit 3-35:

- View 1: From North Ventura Avenue just south of Hartman Turnoff, looking southeast
- View 2: From the eastern terminus of Algonquian Street, looking east
- View 3: From Brock Linear Park at terminus of Cedar Street, looking east
- View 4: From the intersection of Shell Road and Ventura Avenue, looking northeast



Exhibit 3-35: Ventura Steel Site photo keymap

The capture time, date, and other technical details of the high-resolution photographs taken from View 1 through View 4 are provided in Table 3-6, below.

TABLE 3-6
Technical Details of Photographs – Ventura Steel Site

Exhibit Nos.,^a View	Capture Time	Capture Date	Camera Type	Lens Focal Length	Camera Height	Direction
3-36a, 3-36b, View 1	8:18 a.m.	June 22, 2025	Canon EOS 6D	50 mm	Approximately 5.5 Feet Above Ground Level	Facing Southeast
3-37a, 3-37b, View 2	2:31 p.m.	August 23, 2025	Canon EOS 6D	50 mm	Approximately 5.5 Feet Above Ground Level	Facing East
3-38a, 3-38b, View 3	5:15 p.m.	August 15, 2025	Canon EOS 6m2	50 mm	Approximately 5.5 Feet Above Ground Level	Facing East
3-39a, 3-39b, View 4	8:15 a.m.	June 22, 2025	Canon EOS 6D	50 mm	Approximately 5.5 Feet Above Ground Level	Facing Northeast

Note: mm = millimeters.

^a Exhibits with “a” show the existing conditions; exhibits with “b” show visual simulations of the Ventura Steel 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 is a view of the compressor station from Ventura Avenue looking southwest. In Exhibit 3-36b, the proposed Ventura Steel Site compressor station can be seen over the wall surrounding the site.



Exhibit 3-36a: View 1 – existing conditions



Exhibit 3-36b: View 1 – simulated Ventura Steel Site Alternative conditions

View 2 looks toward the service roadway corridor and associated grading from the upper reaches of existing development along the adjacent hillside. The service road itself is unable to be seen from below, but the grading is depicted in the central portion of the image.



Exhibit 3-37a: View 2 – existing conditions



Exhibit 3-37b: View 2 – simulated Ventura Steel Site Alternative conditions

View 3 also depicts the service roadway corridor and associated grading, but from a farther southwest viewpoint that is closer to the base of the hillside. The service road itself cannot be seen from below, but the grading is depicted in the lower third of the image on Exhibit 3-38b.



Exhibit 3-38a: View 3 – existing conditions



Exhibit 3-38b: View 3 – simulated Ventura Steel Alternative conditions

View 4 looks at the compressor station from the intersection of Shell Road and Ventura Avenue. In contrast to View 1, View 4 provides a broader east-to-west depiction of the proposed Ventura Steel Site compressor station and the wall surrounding the site, as shown in Exhibit 3-39b.



Exhibit 3-39a: View 4 – existing conditions



Exhibit 3-39b: View 4 – simulated Ventura Steel Site Alternative conditions

3.3 Air Quality, Greenhouse Gases, and Energy

For each of the three site alternatives, please include the following information (see Responses to Sections 3.3.1–3.3.3):

- 3.3.1 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 Ventura Steel Site Alternative are presented in the Air Quality and Greenhouse Gas Emissions Analysis, included in Appendix 3-C to this document. Compared to the VCM Project, the Ventura Steel Site Alternative would require additional construction activities due to the existing wells at the site and the construction of off-site infrastructure. A detailed comparison of the construction activity differences is provided in Table 3-7, below.

TABLE 3-7**Construction Activity Differences Between VCM Project and Ventura Steel Site Alternative**

Construction Phase	VCM Project	Ventura Steel Site Alternative
Existing Wells at the Proposed Site Location	There are no existing wells.	Decommissioning, abandonment/re-abandonment of 26 existing wells. Soil remediation associated with the abandonment.
Natural Gas Transmission System Pipeline Modifications	There no gas transmission system pipeline modifications required for the VCM Project.	Following the preliminary geohazard re-evaluation, the original routing of the gas transmission pipelines along the hillside ridge was eliminated because some sections of that route are susceptible to landslides, and some sections are also within the Ventura Land Trust preserve. A modified pipeline route, which runs along the toe of the hill and is longer than the original route, was identified.
Grading	Minimal grading, because the VCM Project is already developed. There is existing access to the VCM Project Site.	New grading is required to align with current topography, meet conceptual grading design parameters for proper drainage, and comply with Ventura County stormwater management requirements.
Demolition of Existing Structures Above Ground	There are no major existing structures above ground to be demolished.	Demolition of existing major structures from Aera Facility Operations that is impacted with the new compressor station.
Utilities	Existing connections are available for utilities such as water, wastewater, and power.	New utilities would be installed that would connect to assumed tie-in connections for water and wastewater (or sanitary sewer). For electrical interconnection, there is minimal work involved which is to connect to an existing Southern California Edison (SCE) pole outside the new compressor station.

Please refer to Appendix 3-C for the Air Quality and Greenhouse Gas Emissions Analysis for Ventura Steel Site for more detail on the information presented in this response.

3.3.2 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 the Ventura Steel Site would be the same as the VCM Project. As stated in the PEA, the Ventura Steel Site Alternative would include one new 840 HP natural gas standby generator engine (standby generator), rated at approximately 560 kilowatts peak output power.

3.3.3 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 compressor 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,⁴ 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 that 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.

⁴ 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 gas from and supplying gas to the Los Angeles Basin.

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 horsepower (HP) to replace the previous 68 HP diesel-fired emergency generator. The operating parameters for the portable generator are provided in Table 3-7, below. 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 (pounds per year) were calculated based on the annual schedule of 100 hours per year. These emissions are minimal and are shown in Table 3-8, below.

TABLE 3-7
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.

TABLE 3-8
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
NOx	2.27	0.24	24.14
CO	0.03	0.003	0.32
PM	0.002	0.0002	0.02
SOx	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; NOx = oxides of nitrogen; CO = carbon monoxide; PM = particulate matter; SOx = 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.⁵ 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 3-9.

TABLE 3-9
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
Estimated Total (MSCF/year)				28.62^c

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.⁶ Therefore, SoCalGas cannot accurately estimate pipeline blowdown emissions within the facility boundary and for the purposes of this exercise assumes they are zero.

⁵ 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.

⁶ 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.

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 (MTCO_{2e}). This is the same methodology that was used in response to the CPUC DR Question No. 17, Greenhouse Gas Emission Calculations.⁷ Based on this approach, total GHG emissions were estimated to be approximately 13 MTCO_{2e}/year, as shown in Table 3-10.

TABLE 3-10

Estimated Greenhouse Gas Emissions (MTCO_{2e}) 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
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 ^e	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.

^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.

^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])

⁷ 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.

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 3-11, below.

TABLE 3-11
Estimated TAC Emission Rates from Remaining Facility Components

Fugitive Components			
TAC	CAS NO.	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 (MSCF/hr) / 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.

^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.

3.4 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 Ventura Steel Site consistent with the standards identified in Attachment 2 of the PEA Checklist and is included as Appendix 3-F. The GIS data for both the VCM Project and the Ventura Steel Site Alternative have been submitted as Attachment 3-C, which includes both KMZ and SHP files.

3.5 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 Proposed Project in the PEA and with Cultural Resource Technical Report standards identified in Attachment 3 of the PEA Checklist.

RESPONSE

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

In addition, a Tribal Consultation Report was prepared for the Ventura Steel Site. The Tribal Consultation Report is included as Appendix 3-H to this document.

3.6 Geology, Soils, and Paleontological Resources

For each of the three site alternatives, please include the following information (see Responses to Sections 3.6.1 and 3.6.2):

- 3.6.1 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 Ventura Steel 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 3-I and Appendix 3-J, respectively. The Geosyntec and Burns & McDonnell reports, in combination, emphasize the different geotechnical aspects of the Ventura Steel 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 Ventura Steel Site is located approximately 7000 feet north of the existing Ventura Compressor Station on the east side of the Highway 33 corridor in Ventura County, California. The Ventura Steel Site is located within an approximately 9-acre brownfield oil extraction area situated within the alluvial valley of the Ventura River. The site is relatively flat and is bounded by North Ventura Avenue to the west, East Shell Road to the south, and foothills containing active oil fields to the east (Appendix 3-J, p. 1).

The proposed pipeline route for the Ventura Steel Site Alternative consists of an approximately 2.4-mile-long subterranean pipeline system (two suction and two discharge pipelines). The discharge alignment is approximately 2.4 miles in length, while the suction alignment is approximately 1.9 miles in length. The proposed subterranean pipeline system consists of approximately 8 total miles of new pipeline. The suction pipeline alignment runs from the proposed Ventura Steel Site in the north along undeveloped hillsides and beneath streets and ties into the existing natural gas transmission pipelines to the south. The discharge pipeline alignment follows the same route as the suction pipeline alignment before diverging to the west and running beneath Rocklite Road and North Olive Street to tie into the existing compressor station. Active oil fields lie along the northern stretch of both alignments. The ground elevation along the proposed suction alignment varies significantly, with approximately 430 feet of total elevation change. Likewise, there is approximately 450 feet of total elevation change along the discharge alignment. Slopes range from <5 percent to >50 percent along the alignments (Appendix 3-J, p. 2).

Seismic Hazards

Faulting

The Project Site is located in a seismically active region of Southern California. Faults in California are generally classified as “Holocene-active,” “Pre-Holocene active,” and “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 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 Ventura Steel 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 Ventura Steel 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 Ventura Steel 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 (Appendix 3-I, p. 3). As such, the Ventura Steel Site has a high likelihood of experiencing strong ground shaking (Appendix 3-J, p. 8). The closest fault is 1.6 miles northeast of the Ventura Steel Site; therefore, the likelihood of fault rupture is low. Distances to regional faults and the mean 30-year participation probability are shown in Table 3-12 (Appendix 3-I, p. 4).

TABLE 3-12
Summary of Nearby Faults

Fault	Distance from Ventura Steel Alternative 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	1.6	NR	NR	NR	NR
Ventura–Pitas Point	2.3	1.42	1.40	0.97	<0.01
Red Mountain fault zone (South Strand)	5.8	3.00	2.42	0.13	NR
Javon Canyon	5.8	NR	NR	NR	NR
Sisar	6.5	0.60	0.60	0.53	<0.01
Faults near Oakview and Meiners Oaks	5.7	NR	NR	NR	NR
San Cayetano	13.2	1.69	1.58	0.82	<0.01
Santa Ynez	13.9	1.37	1.30	0.54	NR
Mission Ridge fault system (Mission Ridge section)	19.8	0.64	0.59	0.49	NR
Pine Mountain	20.7	0.42	0.24	0.04	NR
Oak Ridge (Barksdale section)	19.8	1.90	1.54	1.05	<0.01
Big Pine fault zone	25.3	0.32	0.15	0.05	NR

TABLE 3-12
Summary of Nearby Faults

Fault	Distance from Ventura Steel Alternative Site (Miles) ^a	Mean 30-Year Participation Probability (%) ^b			
		M ≥ 6.7	M ≥ 7.0	M ≥ 7.5	M ≥ 8.0
Northridge	33.7	0.85	0.79	0.50	<0.01
San Gabriel fault zone	37.6	0.59	0.57	0.52	0.03
San Andreas fault zone	39.2	17.03	16.97	16.82	6.61

Sources: Appendix 3-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 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 Ventura Steel Site is located within mapped liquefaction zones. Based on groundwater data obtained from the California Department of Water Resources, depth to water table estimates and the proximity to the Ventura River suggest groundwater is moderately shallow (10 to 20 feet below ground surface) at these sites. Therefore, the liquefaction potential at the Ventura Steel Site is considered moderate; however, Geosyntec recommends obtaining site-specific subsurface data to provide a more accurate geotechnical design (Appendix 3-I, p. 6). Additionally, the northern part of both proposed pipeline alignments and the western part of the discharge alignment are within mapped liquefaction areas (Appendix 3-J, p. 8).

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 Ventura Steel Site is not located within mapped landslide zones, and due to the relatively flat conditions at each site, the risk of slope instability associated with landslides is considered low. However, geologic units near the site are noted as moderately to extremely susceptible to landsliding (Appendix 3-J, p. 7).

The proposed alignments intersect known active and recent landslide deposits. Mapped landslides are 10 to >50 feet in thickness. Some geological units along the alignment are noted as being extremely susceptible to landslides (Appendix 3-J, p. 8).

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 Ventura Steel Site's mapped buffer zone (Appendix 3-I, Figure 5) does not include slopes that exceed 60 degrees; therefore, rockfall hazard risks are considered low (Appendix 3-I, pp. 5–6).

Geologic Units

Stratigraphy

The Ventura Steel Site consists of colluvial and alluvial deposits, underlain by sedimentary bedrock at depths ranging from 2 feet below ground surface to 6 feet below ground surface, and in some areas greater than 6 feet below ground surface (Appendix 3-J, p. 9). The subsurface bedrock is primarily sedimentary composed of sandstone, siltstone, shale, and conglomerate, including Santa Barbara claystone and the Pico Formation (Appendix 3-J, p. 4).

Slope Stability

The Ventura Steel Site is located adjacent to a steeply sloped area identified as having a high landslide potential (>15 percent). Although grading activities at the Ventura Steel Site are not expected to impact the known landslide risks nearby, by virtue of proximity, the site could be negatively impacted by a neighboring slope failure (i.e., resulting in blocked access roads). Geotechnical risks to be further identified and/or evaluated through the performance of site and alignment-specific geotechnical investigations should include (but not be limited to) a static and seismic global stability analysis of slopes near the proposed site and alignments (Appendix 3-J, p. 11). As mentioned above, the pipeline alignments intersect known active and recent landslide deposits. Mapped landslides are 10 to >50 feet in thickness. Some geological units along the alignment are noted as being extremely susceptible to landslides (Appendix 3-J, p. 8).

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 Ventura Steel Site’s mapped buffer zone (Appendix 3-I, Figure 5) does not include slopes that exceed 60 degrees; therefore, rockfall hazard risks are considered low (Appendix 3-I, p. 5). Additionally, due to relatively flat conditions, the risk of slope instability associated with landslides and seismically induced landsliding is considered low (Appendix 3-I, p. 5).

Subsidence

Subsidence is the permanent collapse of the pore space within 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 Ventura Steel Site or the proposed 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 Ventura Steel Site and the 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 3-J, p. 14).

Tsunamis and Flooding

The likelihood of flooding or tsunamis in the Ventura Steel Site or the pipeline alignments is 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 3-J, p. 7).

Soils

Soil types at the Ventura Steel Site generally consist of Holocene stream terrace deposits (Qht) and Holocene alluvial fan deposits (Qhf). Holocene stream terrace deposits (Qht) are typically encountered in point bar and overbank settings and consist of unconsolidated clayey sand and sandy clays with gravel. Holocene alluvial fan deposits (Qhf) are typically encountered by

streams emanating from mountain canyons onto alluvial valley floors. These deposits originate as debris flows, hyper-concentrated mudflows, or braided stream flows and are composed of moderately to poorly sorted and moderately to poorly bedded sandy clays with some gravel (Appendix 3-J, p. 3).

Both proposed pipeline alignments cross through undivided Holocene alluvial, colluvial, and active stream deposits on the floors of valleys, composed of unconsolidated sandy clay with some gravel (Qha); Pleistocene Santa Barbara claystone, containing Monterey Formation shale fragments (Qsb); Holocene to Pleistocene landslide deposits and active landslides, composed of weathered broken-up rocks (Qls); the Pliocene undivided Pico Formation, composed of claystone, siltstone, and sandstone that is locally pebbly (Tp); and Holocene alluvial fan deposits, deposited by streams emerging from mountain canyons onto alluvial valley floors (Qhf). Where it diverges from the suction pipeline alignment, the discharge pipeline alignment crosses through undivided Holocene alluvial, colluvial, and active stream deposits (Qha) and historically active wash deposits adjacent to an active channel, composed of unconsolidated sands, silts, and gravels (Qw1) (Appendix 3-J, p. 4).

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

RESPONSE

Please see Appendix 3-K for the Paleontological Resources Inventory Memorandum (both public and confidential versions) for the Ventura Steel Site.

3.7 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 Ventura Steel Site has been previously graded and developed, resulting in an average on site slope of approximately 6 percent. The surrounding area is similarly improved to the north, west, and southeast, with slopes of less than 20 percent. Development of a compressor station at the Ventura Steel Site is not anticipated to increase the amount of impervious surface currently at the site. 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 Ventura Steel 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 stormwater and 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 Ventura Steel 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. The Ventura Steel Site is an active pipe storage and staging yard and is currently used to support Aera's ongoing oilfield operations. There are currently 26 existing oil wells that are inside the facility boundary and 7 existing oil wells in the temporary staging area. See Ventura Steel Site Drawing 152084-3005-D-SKT, Conceptual Plot Plan with Wells (refer to Appendix 3-A to this document). No environmental site assessment, geotechnical investigation, or topographic survey has been performed at the Ventura Steel Site to determine soil type, potential soil/groundwater contamination, depth to groundwater, or surface drainage. As such, the current assumption is that the presence of existing oil wells may have resulted in existing soil and/or groundwater contamination or could result in soil/groundwater contamination in the future.

The Ventura County Technical Guidance Manual states one of the conditions for technical infeasibility is due to brownfield development sites where infiltration poses a risk of causing pollutant mobilization. Because there is a potential for contaminated soil or groundwater at this site, the use of infiltration basins is precluded. A lined detention basin that is sized to hold the Stormwater Quality Design Volume runoff would be constructed at the site. The discharge from the basin would be routed through proprietary prefabricated filter units that meet the requirements of the Ventura County Technical Guidance Manual. The discharge would then be routed to the existing County stormwater sewer and the nearby Ventura River. See Ventura Steel Site Drawing 152084-3003-D-SKT Rev 0, Conceptual Plot Plan, which details the location of the stormwater detention structure, and Ventura Steel Site Drawing 152084-7035-D-SKT Rev 0, Conceptual Site Surfacing Plan, for details. The feasibility of using stormwater detention and treatment to control stormwater runoff would be subject to local permitting agency approval.

In compliance with the Ventura County Technical Guidance Manual, the amount of detained stormwater would be equal to the 85th percentile 24-hour runoff event, determined for the Ventura Steel 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 those under existing conditions. Development of the Ventura Steel Site Alternative would not substantially alter the existing drainage of the Ventura Steel 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.

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 for the Ventura Steel Site Alternative would be greater for short-term construction impacts and similar for long-term operational impacts when compared to the VCM Project. Impacts would be more widespread under the Ventura Steel Site Alternative because it would require site remediation and substantial improvements off site that would not be required as part of the VCM Project. Based on a preliminary desktop assessment, the proposed methodology for stormwater management at the Ventura Steel Site is construction of a lined detention structure with filters to treat stormwater runoff at the site prior to its being released into the County storm sewer system and the nearby Ventura River. This is the same design approach used for the VCM Project. In addition, similar to the VCM Project, a SWPPP would be developed and implemented during construction 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 or ground water quality.

Please refer to Appendix 3-A for Ventura Steel Site Drawings 152084-3005-D-SKT, Conceptual Plot Plan with Wells; 152084-3003-D-SKT, Conceptual Plot Plan; and 152084-7035-D-SKT, Conceptual Site Surfacing Plan.

3.8 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

Compressor Station Facility Boundary

CPUC has preemptive jurisdiction over the construction, maintenance, and operation of gas utility facilities in the state. Preemption of the Ventura County Non-Coastal Zoning Ordinance setback requirements from decommissioned or abandoned wells Ventura County Non-Coastal Zoning Ordinance is assumed; therefore, a setback distance of between a 10- and 25-foot radius has been assumed for all wells inside the facility boundary for equipment arrangement and construction purposes.

Ventura Steel Site Facility Boundary

The preliminary desktop assessment has identified that 26 existing oil wells would be inside the proposed compressor station facility boundary at the Ventura Steel Site. All 26 wells would need to be decommissioned or re-abandoned to current CalGEM requirements.⁸

Please see Table 3-13, below, which identifies these wells and Drawing 152084-3005-D-SKT, Conceptual Plot Plan with Wells in Appendix 3-A.

Existing Facility Boundary

A total of 26 existing oil wells inside the existing facility boundary would need to be decommissioned and re-abandoned before the new facility is constructed.

TABLE 3-13**Existing Oil Wells Within the Ventura Steel Site Alternative Facility Boundary**

Sequential No.	Site	Well Designation	Well Status	Well Type
1	Ventura Steel	Gosnell 56	Active	Oil & Gas
2	Ventura Steel	Gosnell 45	Idle	Oil & Gas
3	Ventura Steel	Gosnell 47	Active	Waterflood
4	Ventura Steel	Gosnell 48	Idle	Oil & Gas
5	Ventura Steel	Gosnell 50	Idle	Oil & Gas
6	Ventura Steel	Gosnell 51	Active	Waterflood
7	Ventura Steel	Gosnell 52	Active	Waterflood
8	Ventura Steel	Gosnell 53	Active	Waterflood
9	Ventura Steel	Gosnell 35	Active	Oil & Gas
10	Ventura Steel	Gosnell 40	Active	Oil & Gas
11	Ventura Steel	Gosnell 41	Active	Waterflood
12	Ventura Steel	Gosnell 39	Active	Oil & Gas
13	Ventura Steel	Gosnell 3	Plugged & Abandoned	Oil & Gas
14	Ventura Steel	Gosnell 4	Plugged & Abandoned	Oil & Gas
15	Ventura Steel	Gosnell 14	Plugged & Abandoned	Oil & Gas
16	Ventura Steel	Gosnell 19	Plugged & Abandoned	Oil & Gas
17	Ventura Steel	Gosnell 38	Plugged & Abandoned	Oil & Gas
18	Ventura Steel	Gosnell 1	Plugged & Abandoned	Oil & Gas
19	Ventura Steel	Gosnell 2	Plugged & Abandoned	Oil & Gas

⁸ Per CalGEM, “decommissioning” is defined as the process of safely dismantling and removing an oil production facility or related infrastructure and restoring the site to its original condition. “Abandonment” is defined as the permanent closure and sealing of the wellbore of an oil gas well.

TABLE 3-13**Existing Oil Wells Within the Ventura Steel Site Alternative Facility Boundary**

Sequential No.	Site	Well Designation	Well Status	Well Type
20	Ventura Steel	Gosnell 21	Plugged & Abandoned	Oil & Gas
21	Ventura Steel	Gosnell 15	Plugged & Abandoned	Oil & Gas
22	Ventura Steel	Gosnell 17	Plugged & Abandoned	Oil & Gas
23	Ventura Steel	Gosnell 23	Plugged & Abandoned	Oil & Gas
24	Ventura Steel	Gosnell 49	Plugged & Abandoned	Oil & Gas
25	Ventura Steel	Gosnell 37	Plugged & Abandoned	Oil & Gas
26	Ventura Steel	Gosnell 42	Plugged & Abandoned	Oil & Gas

Gas Pipeline Corridor

Based on the current assessment, SoCalGas does not anticipate abandoning any wells along the conceptual pipeline corridor identified for the Ventura Steel Site Alternative.

Temporary Staging Area

The assumption at this time is that the existing oil wells located in the temporary staging areas for the Ventura Steel Site Alternative would not require decommissioning. However, this would need to be validated with CalGEM in the subsequent phases of the project.

Refer to Drawing 152084-3005-D-SKT, Conceptual Plot Plan with Wells in Appendix 3-A.

3.9 Noise

For each of the three site alternatives, please include the following information (see Responses to Sections 3.9.1–3.9.3):

3.9.1 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 Ventura Steel Site is within the County of Ventura; however, the majority of the sensitive receptors are within the City of Ventura. The County of Ventura defines noise-sensitive uses as generally including those land uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. These uses include residences; schools; nursing homes; historic sites; cemeteries; parks, recreation, and open space areas; hospitals and care facilities; hotels and other short-term lodging (e.g., bed and breakfasts, motels); places of worship; and libraries. 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 1,427 noise sensitive properties within 1 mile of the Ventura Steel Site are listed in Appendix 3-L, including information on location, land use, and distance from the Ventura Steel Site. Figure 1 in Appendix 3-L displays these same noise sensitive properties.

Please refer to Appendix 3-L, Noise Sensitive Receptors, for information on and location of noise-sensitive receptors near the Ventura Steel Site.

3.9.2 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 3-M for the noise study prepared for the Ventura Steel Site.

3.9.3 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 was prepared for the VCM Project Site and is included as Appendix 3-N to this document.

Please refer to Appendix 3-N for detailed information regarding long-term remaining noise sources at the Ventura Steel Site.

3.10 Transportation

Please provide the following information for each of the site alternatives (see Responses to Sections 3.10.1 and 3.10.2):

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

RESPONSE

As shown in Table 3-14, the City's total work-based VMT per employee is 17.37, the VCM Project's TAZ's total work-based VMT per employee is 19.10, and the Ventura Steel Alternative Site crosses several TAZs, with total work-based VMT per employee ranging from 17.69 to 23.96. These last numbers are similar to or less than the total work-based VMT per employee for unincorporated Ventura County (23.98)

TABLE 3-14
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				
Ventura Steel Site	60024201	23.20	23.96	27.27
	60004301	15.07	23.08	28.66
	60008301	14.39	19.10	21.74
	60008101	12.26	19.99	20.59
	60004101	10.88	17.69	18.20

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.

3.10.2 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 3-15, below, Phases A1–A6 for the Ventura Steel Site Alternative would be in addition to the construction phases in the VCM Project. The total days of construction for each

phase of the Ventura Steel Site Alternative are slightly different than those of the VCM Project. As detailed in the VMT spreadsheet in Attachment 3-D, overall construction VMT for the Ventura Steel Site Alternative would be slightly less than that of the VCM Project.

TABLE 3-15

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	20	200	2,800
A2	Soils Remediation	50	1,220	135,420
A3	Well Abandonment	51	1,326	560,898
A4	Off-site Laydown Development	32	320	15,040
A5	Gas Pipeline Installation	163	1,910	515,700
A6	Electrical Interconnect	31	590	7,080
1	Subsurface Exploration	41	580	27,260
2	Demo Existing Equipment & Piping	25	425	28,475
3	Site Preparation/Rough Grading	92	2,688	48,384
4	Foundations	94	1,280	222,720
5	Trenching/Undergrounds	57	876	50,808
6	Equipment, Structural Steel and Building Erection, and Piping	101	1,298	281,666
7	Electrical and Instrumentation	53	564	129,720
8	Paving	34	736	30,912
9	Painting/Insulation	13	436	17,876
10	Commissioning/Startup and Testing	43	532	62,776
11	Site Restoration	14	616	13,552
12	Decommissioning/Demolition	49	520	34,840

Note: VMT = vehicle miles traveled.

3.11 Utilities and Service Systems

Please provide the following information for each alternative (see Responses to Sections 3.11.1–3.11.3):

3.11.1 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 Ventura Steel Site would include two new suction and two new discharge transmission pipeline installations. These installations would require suction gas flow from existing transmission pipelines to the Ventura Steel Site and discharge gas flow from the Ventura Steel Site to the existing Ventura Compressor Station. Refer to Table 3-16, below, for size and length of the new pipelines. See the Ventura Steel Site Drawing 152084-7701-D-SKT, Conceptual Pipeline Route Plan, for the pipeline alignment and assumed tie-in locations.

Water

Per Aera Energy LLC letter,⁹ the Ventura Steel Site is an active pipe storage and staging yard and is currently used to support Aera's ongoing oilfield operations. It is assumed the facility would connect to an existing water main at two locations along East Shell Road to accommodate fire protection and potable water needs. See Table 3-16, below, for size and length of the new water line. See Ventura Steel Site Drawing 152084-7037-D-SKT, Conceptual Utility Plan, in Appendix 3-A for the waterline alignment and assumed tie-in locations.

Wastewater

It is assumed the facility would connect to an existing sewer main along East Shell Road. Refer to Table 3-16, below, for size and length of the new wastewater line.

See Ventura Steel Site Drawing 152084-7037-D-SKT, Conceptual Utility Plan, in Appendix 3-A for the sewer line alignment and assumed tie-in location.

Southern California Edison (SCE) Electrical Interconnection

The Ventura Steel Site Alternative would include installation of a new pole to connect to an existing SCE electrical line located outside the facility boundary along Ventura Avenue. No electrical substation would be required for this alternative. See Table 3-16 for the length of the new electrical interconnect. See Ventura Steel Site Drawing 152084-7037-D-SKT, Conceptual Utility Plan, in Appendix 3-A for the electrical line alignment and assumed tie-in location and Ventura Steel Site Drawing 152084-5501-D-SKT, in Appendix 3-A for the electrical details.

⁹ Manatt Letter to CPUC, Aera Energy LLC Scoping Comments on Ventura Compressor Station Project (CPCN Application No. A.23-08-019), dated May 13, 2025.

Mapping of Above and Below Ground Utilities

Based on a desktop study, there would be no interference with any existing utilities or nearby installations. However, a site investigation would need to be conducted 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 3-16, below, for preliminary sizes and lengths of the gas pipelines, waterline, wastewater line, and electrical interconnect. These values are approximations and would need to be validated and updated in future phases of design.

Table 3-16
Summary of New Utilities for Ventura Steel Site Alternative

Utility	Size (Inches in Diameter)	Length (Feet)
Suction Gas Lines	20	18,200
Discharge Gas Lines	20	25,200
Water Line	6	50
Wastewater Line	4	25
Electrical Interconnect	N/A	140

Note: N/A = not applicable.

Please refer to Appendix 3-A for Ventura Steel Site Drawings 152084-7701-D-SKT, 152084-7037-D-SKT, and 152084-5501-D-SKT for the Conceptual Pipeline Route Plan, the Conceptual Utility Plan, and the Electrical Distribution Interconnect Preliminary Details.

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

RESPONSE

The estimated amount of wastewater and solid waste that would be generated for Ventura Steel for both the construction and operations and maintenance phases, is provided in Tables 3-17 and 3-18, below.

Construction Phase

The preliminary quantities for solid waste and wastewater for the Ventura Steel Site Alternative during construction are estimated in Table 3-17, below (originally from Table 5.19-5 in the PEA).

TABLE 3-17
Ventura Steel Site Alternative Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Ventura Steel Site Alternative Estimated Total (Pounds)	Disposal Method
Pipeline & Electrical Line	Solid	Construction	Human Waste/ Refuse – Pipeline & Elec. Line	N/A	208,000	Portable Toilet Service Disposal
Pipeline & Electrical Line	Solid	Construction	Post-Consumer Food Waste Pipeline & Elec. Line	N/A	288	Landfill
Facility	Solid	Construction	Human Waste/ Refuse	720,000	720,000	Portable Toilet Service Disposal
Facility	Solid	Construction	Post-Consumer Food Waste	300	300	Landfill
Facility	Solid	Construction	Asphalt (Demo)	4,650,000	128,000	Landfill
Facility	Solid	Construction	Concrete (Demo)	440,000	8,000	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

TABLE 3-17
Ventura Steel Site Alternative Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Ventura Steel Site Alternative Estimated Total (Pounds)	Disposal Method
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	150	Landfill
Waterline	Solid	Construction	Ductile Iron Pipe Waste	N/A	120	Recycle
Waterline	Solid	Construction	Packing Materials (Wood Spacers/ Pallets/ Cardboard Boxes)	N/A	200	Landfill
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	5,298,500 (635,300 Gallons)	Drain to Closest Sewer
Waterline	Liquid	Construction	Hydrotest Water	N/A	415 (50 Gallons)	Use for Irrigation
Facility	Gas	Construction	Natural Gas	N/A	N/A	To Atmosphere
Facility	Gas	Construction	Nitrogen	250	250	To Atmosphere

TABLE 3-17**Ventura Steel Site Alternative Construction Waste Estimates**

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Ventura Steel Site Alternative Estimated Total (Pounds)	Disposal Method
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 Ventura Steel Site Alternative during operation and maintenance are estimated in Table 3-18, below (originally from Table 5.19-6 in the PEA). The assumption is that the quantities of waste for the Ventura Steel Site Alternative would remain the same as for the VCM Project.

TABLE 3-18**Ventura Steel Site Alternative Plant Operation Waste Estimates**

Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total	Ventura Steel 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

TABLE 3-18**Ventura Steel Site Alternative Plant Operation Waste Estimates**

Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total	Ventura Steel Site Alternative Estimated Total	Disposal Method
Liquid	Plant Operation	Industrial Water	700 Gallons per Month	700 Gallons per Month	Hazardous Waste Facility

Note: VCM = Ventura Compressor Station Modernization.

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

RESPONSE

Within the Ventura Steel Site, there are no stormwater drains that are visible. However, outside the proposed facility boundary, there are two stormwater inlet grates that were observed at the intersection of North Ventura Avenue and East Shell Road (Exhibit 3-40). The photography in Exhibit 3-40 was conducted by SoCalGas in 2025 from a publicly accessible area.



Exhibit 3-40: Stormwater inlet at North Ventura Avenue and East Shell Road

It is assumed that a storm drain lateral exists along East Shell Road and further site assessment would be required in coordination with the City/County to confirm these assumptions.