

SCOPING REPORT

Ventura Compressor Modernization Project

Prepared for

**California Public
Utilities Commission**

Submitted by



May 2025

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1. INTRODUCTION

1.1. Background

In its California Public Utilities Commission (CPUC) application (A.23-08-019), filed on August 24, 2023, Southern California Gas Company (SoCalGas) applied for a Certificate of Public Convenience and Necessity (CPCN) for the proposed Ventura Compressor Modernization Project (Project). The CPUC is the lead agency for the purposes of the California Environmental Quality Act (CEQA) review. Based on its review of the application and the Proponent's Environmental Assessment (PEA), the CPUC is preparing an Environmental Impact Report (EIR) to evaluate potential effects of the Project, pursuant to CEQA.

The CPUC issued a Notice of Preparation (NOP) of an EIR for the Project on February 28, 2025, which initiated agency consultation regarding the scope and content of information to be analyzed in the EIR (a process called "scoping") and invited early public input about potential environmental concerns (Pub. Res. Code § 21080.4(a); CEQA Guidelines §§ 15082(b), 15083). CEQA Guidelines § 15083 provides that a "Lead Agency may...consult directly with any person...it believes will be concerned with the environmental effects of the project."

Section 15083(a) states that scoping can be "helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." Scoping is an effective way to bring together and consider the concerns of affected State, regional, and local agencies, the project proponent, and other interested persons (CEQA Guidelines § 15083(b)).

This scoping report describes the scoping process undertaken by the CPUC and provides an overview and summary of the written and oral comments provided by agencies and individuals. The scoping period commenced February 28, 2025, and closed on April 30, 2025.

1.2. Purpose of Scoping

The CPUC will use this scoping report to inform the preparation of a comprehensive EIR which will consider agency and community concerns. Pursuant to CEQA Guidelines § 15082, all public comments within the scope of CEQA will be considered in the EIR process.

The CPUC will use scoping comments to:

- Define the issues and alternatives for the proposed Project for evaluation in the EIR;
- Focus the environmental analysis;
- Identify potential environmental impacts for consideration in the EIR; and
- Identify potential mitigation measures for consideration in the EIR

Comments received during the scoping process are part of the public record. The comments and questions received during the public scoping process have been reviewed and considered by the CPUC in determining the appropriate scope of issues to be addressed in the EIR.

2. DESCRIPTION OF PROJECT

2.1. Project Summary

The proposed Project would modernize the Ventura Compressor Station, located at 1555 North Olive Street in the City of San Buenaventura (Ventura).

The scope of the proposed Project includes:

1. replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal HP (estimated horsepower), electric-motor-driven compressors (electric compressors), with zero nitrogen oxide (NOx) emissions, resulting in a “hybrid” compressor station;
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 to replace the existing west and south chain-link fence/block wall; and
6. implementing other ancillary site improvements, such as piping interconnection and storage tanks.

The existing compressor equipment and temporary office facilities would be decommissioned approximately one year after the new facility has become fully operational.

2.2. Project Location

The proposed Project is located on an approximately 8.42-acre property at 1555 North Olive Street in the City of Ventura, California. The proposed Project would include replacement of existing natural-gas-driven compressors, construction of associated facilities and site improvements at the existing compressor station site. The existing compressor equipment at the site would be decommissioned approximately one year after the new facility has become fully operational.

The surrounding area includes industrial uses, a school, and residential parcels. One residential parcel is adjacent to the northeast corner of the Project site fronting North Olive Street. The E.P. Foster Elementary School is located across North Olive Street to the east of the Project site.

3. SCOPING PROCESS

3.1. Early Outreach

Prior to finding the application complete, the CPUC launched a project website to provide an overview of the CPUC review process. The project website describes on the ongoing environmental review process. The project website provides a summary of the project and links to the application and PEA. The site also provides copies of correspondence leading up to the CPUC finding the application complete.

The CPUC also established a project-specific email address and voicemail as a means of submitting comments on the CEQA review of the project. The email address was shown mailings announcing scoping, at the scoping meetings, and posted on the CPUC website. The CPUC considered all timely scoping comments received by email and incorporated them into this report. The project website, email address, and phone line were established prior to the scoping process.

These outreach options are described below.

- **Project Website.** The CPUC established a project-specific website to house all project-related documents during the CEQA process. During the scoping period, the website presented details on the scoping meetings, and described how comments could be submitted. This website will be updated throughout the review of the MOX Project to serve as a resource of project reports and updates.

<https://ia.cpuc.ca.gov/environment/info/asp/venturacompressor/vcm.htm>

- **Project Email Address.** The CPUC provided an email address (vcm_ceqa@aspnecg.com) for electronic submittal of comments.
- **Phone Line.** A voicemail was set up to take questions from the public or requests for more information. This phone line (877-225-7817) provided another avenue for the public to obtain information about the project. This phone line will continue to be used throughout the project review process.
- **Project Contact List.** The CPUC has compiled a project-specific mailing list with approximately 900 entries. This list includes responsible, trustee, and commenting agencies, the State Clearinghouse, tribal governments, property owners, residents, and other interested persons and organizations.

The mailing list is periodically updated based on contact information from the comment letters or inquiries received during the scoping comment period. This mailing or distribution list will continue to be used throughout the environmental review process to distribute public notices and will be updated regularly to ensure all interested parties are notified of key project milestones.

3.2. Notice of Preparation

On February 28, 2025, the CPUC issued a Notice of Preparation (NOP) consistent with CEQA Guidelines Section 15082. The NOP described the proposed Project, project location and the probable environmental effects. The NOP stated the CPUC's intention to prepare an EIR and requested comments from interested parties.

Attachment 1, Notice of Preparation, provides a copy of the NOP, and Attachment 2, provides the notice in Spanish.

In addition to mailing the NOP to agencies and Native American tribes, a postcard notice was mailed to landowners of parcels within 1,000 feet of the site, three site alternatives, and the preliminary alignments of linear facilities for site alternatives, as identified in the PEA.

Overall, copies of NOPs and scoping notices were mailed to responsible, trustee, and commenting agencies the State Clearinghouse, tribal governments, property owners, residents, and other interested persons and organizations, as detailed below.

- 16 NOPs were distributed via U.S. Mail;
- 150 NOPs were distributed via email; and
- 750 postcard notices were distributed by U.S. Mail.

The NOP was also:

- Filed at the State Clearinghouse, a division of the Governor’s Office of Land Use and Climate Innovation (SCH 2025021225), and
- Posted at the Ventura County Clerk (Filing number: 2025100002413, March 3, 2025).

The CPUC transmitted copies of the NOP by certified mail to commenting agencies including:

- | | |
|---|--|
| ■ California Air Resources Board | ■ Native American Heritage Commission |
| ■ California Department of Fish & Wildlife Region #5 | ■ Office of Historic Preservation |
| ■ California Department of Toxic Substances Control | ■ Regional Water Quality Control Board, Region 4 |
| ■ California Emergency Management Agency | ■ City of San Buenaventura (Ventura) |
| ■ California Energy Commission | ■ Ventura Unified School District |
| ■ California Public Utilities Commission, Public Advocates Office | ■ Ventura City Fire Department |
| ■ California State Water Resources Control Board: Water Quality | ■ County of Ventura |
| ■ Caltrans District #7 | ■ Ventura County Air Pollution Control District |

3.3. Public Scoping Meetings

The CPUC held one virtual public scoping meeting using the Zoom Meetings software and added a second in-person and virtual meeting.

During the March 11, 2025, online scoping meeting, CPUC announced the intentions to add a second scoping meeting, in-person, in the City of Ventura, with Spanish translation to be available. Additionally, the presentation made clear that the scoping period would be extended. On March 27, the CPUC announced via email and on the project website, the schedule and location for the April 15, 2025, in-person meeting and an extension of the comment period to close two weeks after the in-person scoping meeting April 30, 2025.

In both scoping meetings, attendees could access either meeting through an internet connection or a phone call. Details on the scoping meetings appear in Table 1.

Table 1. Public Scoping Meetings

Details	Virtual Meeting	In-Person and Virtual Meeting
Day & Date	Tuesday, March 11, 2025	Tuesday April 15, 2025
Time	6:00 p.m.	6:30 p.m.
How to Participate	Attend via Zoom: https://us02web.zoom.us/j/81432321651 Attend via phone: (669) 900-6833 Webinar ID: 814 3232 1651	Attend via Zoom: https://us02web.zoom.us/j/84280875401 Attend via phone: (669) 900-6833 Webinar ID: 842 8087 5401 Bell Arts Factory, Community Room 432 North Ventura Avenue Ventura, CA 93001

The purpose of the scoping meetings was to present information about the Ventura Compressor Modernization Project and the CPUC's decision making processes, and to listen to public comments. A copy of the scoping meeting presentation is presented in Attachment 3, Scoping Meeting Presentation.

All oral comments made at the scoping meetings were recorded and are included in the summary of comments in Section 4 of this report. Attachment 4, Oral Scoping Comments includes the complete comments presented at these meetings, which were transcribed from the meeting recordings.

3.4. Agency and Tribal Government Consultation

CPUC distributed notices to local agencies and officials and resource agencies to inform them about the upcoming Project and its scoping period. Approximately 16 agencies were contacted to identify issues of concern and to provide information on the Project. The agencies were also notified at the start of scoping and will continue to be noticed regarding project activities.

Additionally, the CPUC provided notice to tribal government representatives prior to and at the start of scoping. More than 40 tribal representatives received notice of the start of scoping for this Project; the NOP was distributed to tribal representatives through U.S. Mail or via email depending on the available contact information. The CPUC will continue to coordinate with tribal governments and tribal representatives consistent with CEQA requirements.

Tribes contacted are listed below:

- Barbareño / Ventureño Band of Mission Indians
- Chumash Council of Bakersfield
- Coastal Band of the Chumash Nation
- Gabrieleño / Tongva San Gabriel Band of Mission Indians
- Gabrieleño / Tongva Nation
- Gabrieleño / Tongva Tribe
- Northern Chumash Tribal Council
- San Luis Obispo County Chumash Council
- Santa Ynez Band of Chumash Indians
- Agua Caliente Band of Cahuilla Indians
- Costoanoan Rumsen Carmel Tribe
- Cabazon Band of Mission Indians
- Cocopah Indian Tribe
- Colorado River Indian Tribes
- Elk Valley Rancheria
- Federated Indians of Graton Rancheria
- Quechan Indian Tribe of Fort Yuma Indian Reservation
- Gabrieleño Band of Mission Indians
- Karuk Tribe
- Mission Creek Band of Mission Indians, Mission Creek Reservation
- Morongo Band of Mission Indians
- Ohlone/Costanoan-Esselen Nation
- Pala Band of Mission Indians
- Pechanga Band of Luiseño Mission Indians
- Rincon Band of Luiseño Indians
- San Luis Rey Band of Mission Indians
- Santa Ynez Band of Chumash Indians
- Santa Ysabel Band of Lipay Nation (Kumeyaay)
- Shasta Indian Nation
- Stewarts Point Rancheria (Kashia)
- Susanville Indian Rancheria
- Sycuan Band of Kumeyaay Nation (Sycuan Band)
- Tejon Indian Tribe
- Tongva Ancestral Territorial Tribal Nation (TATTN)
- Torres Martinez Desert Cahuilla Indians
- Twenty Nine Palms Band of Mission Indians
- United Auburn Indian Community
- Xolon Salinan Tribe
- San Manuel Band of Mission Indians
- Chicken Ranch Rancheria of Me-wuk Indians of California
- Table Mountain Rancheria

4. SCOPING COMMENTS

A total of 39 written comment letters were submitted by email during the scoping period. Table 2 provides a list of the commenters.

Attachment 4 includes transcripts of the recorded scoping meetings.

Attachment 5 includes copies of all comment letters in their original format.

Table 2. Written Scoping Comments Received

Comment Number	Date	Commenter
A: Public Agencies		
A01	04-29-2025	City of San Buenaventura
A02	04-30-2025	CPUC Public Advocates Office (Cal Advocates)
A03	04-30-2025	Ventura County Resource Management Agency-Planning Division
A03(a)	04-30-2025	Ventura County Air Pollution Control District
A03(b)	04-30-2025	Ventura County Planning and Fire
A03(c)	04-30-2025	Ventura County Public Works – Watershed Protection
B: Groups, Organizations, and Companies		
B01	03-06-2025	Email String - Kevin Bundy (CFROG), Matthew Vespa (CAUSE), Rebecca L. Davis (Patagonia), Ada Statler (CAUSE)
B02	03-17-2025	Brooke Balthaser, CFROG
B03	03-27-2025	First Amendment Foundation Ventura County (John Brooks)
B04	04-08-2025	CAUSE, CFROG and Patagonia
B05	04-29-2025	Wood-Claeyssens Foundation
B06	05-13-2025	Aera Energy LLC
C: Tribal Governments		
C01	03-03-2025	THPO Agua Caliente
C02	03-06-2025	Mathew Lin, Native American Heritage Commission
D: Public Meetings		
Virtual Meeting	03-11-2025	Attachment 4 includes transcripts of the recorded scoping meetings.
In-Person Meeting	04-15-2025	Attachment 4 includes transcripts of the recorded scoping meetings.
E: Private Citizens		
E01	03-02-2025	Mike Dawson
E02	03-31-2025	Katie Davis
E03	04-15-2025	Jim Yarbrough
E04	04-16-2025	Richard Neve, Ph.D.
E05	04-16-2025	Ann Dorsey
E06	04-17-2025	Alana Sheeren
E07	04-21-2025	John and Sharon Broberg
E08	04-22-2025	Lucky Lynch
E09	04-22-2025	Jean Bramer
E10	04-23-2025	Madeline Renn
E11	04-22-2025	Kari Aist
E12	04-24-2025	Melissa Muñoz

Comment Number	Date	Commenter
E13	04-26-2025	Julie Henszey
E14	04-27-2025	Denia Gonzalez
E15	04-28-2025	Alison Huyett
E16	04-29-2025	Margot Davis
E17	04-29-2025	Emmma Aist
E18	04-30-2025	Danielle O'Dea
E19	04-30-2025	Brenda Holmes
E20	04-29-2025	Noah Aist
E21	04-29-2025	Paul Aist
E22	04-29-2025	Kari Aist, Shanti Sandosham, Ian Campbell
E23	04-30-2025	Michelle Kemick
E24	04-30-2025	James Baylis
E25	04-30-2025	Nicolette Walker-Itza
E26	04-30-2025	Sonia Kroth

4.1. Key Issues Raised during the Public Comment Period

4.1.1. Project Description

- The City of Ventura objected to the proposed Project and continued operation of the existing compressor station due to safety and health concerns.
- The City expressed dissatisfaction with SoCalGas' Proponent's Environmental Assessment (PEA).
- Commenters raised concerns about the scope and scale of the Project and emphasized the need for a thorough evaluation of its community impacts.
- Commenters questioned the validity of SoCalGas's claims about electric supply reliability and the necessity of retaining natural gas in the project.
- Commenters expressed distrust in the oil and gas industry and advocated for cleaner, safer solutions.
- Commenters emphasized the importance of evaluating the Project's consistency with local and state policies.
- Commenters suggested that the proposed Project should include measures to mitigate any adverse environmental effects.
- Commenters expressed concerns about the potential long-term impacts of the project on the community.
- Commenters stated that the proposed Project, which SoCalGas estimated could cost up to \$731 million, would be a waste of ratepayers' funds and questioned its necessity.
- Commenters urged CPUC Staff to evaluate SoCalGas' responses in its General Rate Case (A.22-05-015) and Application A.23-08-019 when preparing the Draft EIR.
- Commenters stated that CEQA Staff should incorporate the CPUC's Environmental and Social Justice (ESJ) policy in the Draft EIR and reject the proposed Project as a violation of Section VI.A.4.c of General Order 177.
- Commenters urged CEQA Staff to address unintended consequences of the proposed Project and reject it in its entirety.

- Commenters emphasized the need for a comprehensive EIR that incorporated community experiences and priorities.
- The Coalition, comprised of CAUSE (Central Coast Alliance United for a Sustainable Economy), CFROG (Climate First: Replacing Oil and Gas) and Patagonia, stated that the NOP did not provide an adequate description of the proposed Project due to lack of objectives, and suggested the Project's objectives should be re-defined to avoid artificially narrowing the scope of alternatives.
- One comment suggested reaching out to Chumash tribe for cultural resources.

4.1.2. Alternatives

- Commenters and the City of Ventura emphasized that the Devil's Canyon Road site was not located in an ESJ community and had lower population density, making it more suitable.
- Commenters argued that alternative sites would pose fewer risks to the community and should be thoroughly evaluated in the Draft EIR.
- Commenters suggest prioritizing alternatives that decrease project size and prioritize electric compressors.
- Commenters urged the CPUC to prioritize the well-being of Ventura residents and consider alternative locations and evaluate the health and safety impacts comprehensively.
- Commenters criticized SoCalGas for dismissing alternative sites without adequate analysis.
- Commenters recommended considering electrification, energy efficiency, and renewable natural gas as viable alternatives to the project.
- Commenters emphasized the need for a comprehensive EIR that incorporated community experiences and considered renewable alternatives.
- Commenters expressed concern regarding wildfires and the proposed Project.
- Commenters argued that SoCalGas used unrealistic feasibility and cost assumptions when analyzing alternatives for the PEA.
- The City of Ventura requested that the Draft EIR should consider an alternative of PG&E serving the North Coastal Region System, to render SoCalGas' proposed Project and the existing Ventura Compressor Station unnecessary.
- The City of Ventura requested consideration of non-pipeline alternatives to mitigate the alleged need for SoCalGas' proposed Project.
- The City of Ventura requested consideration of compressor station configuration alternatives by investigating the reliability of electric supply and the need for a continuous supply of electricity.
- The Wood-Claeysens Foundation opposed further study of the Avocado and Devil's Canyon sites, stating that the areas are occupied by their businesses and unavailable to build upon, stating they would not cooperate with any studies nor allow access to the property.
- Aera stated that the Avocado and Devil's Canyon sites should be excluded from further study, citing environmental constraints such as proximity to blue-line streams, potential impacts on water quality and ecological corridors, conversion of productive agricultural land, and risks to wildlife habitat.
- Aera supported continued evaluation of the Ventura Steel site, noting its existing industrial use and minimal environmental sensitivity, but stated that relocation of its current operations should be fully funded by SoCalGas to avoid disruption.

- Aera proposed its decommissioned gas compressor site as a reasonable alternative, highlighting its prior industrial use, full disturbance, minimal environmental sensitivity, existing access infrastructure, and compatibility with project needs.
- The Ventura County Fire Department stated that the alternative sites could be permitted for development if a fire protection plan is implemented, along with site improvements such as adequate water supply and access road dimensions (width and turning radius), in accordance with the County Fire Code.

4.1.3. Environmental and Social Justice

- Commenters highlighted the disproportionate pollution burdens faced by the Environmental and Social Justice (ESJ) community and urged CEQA Staff to incorporate the CPUC's ESJ policy in the Draft EIR.
- Commenters noted that SB 1137 prohibits oil drilling within 3,200 feet of homes and questioned how the health risk of compressor stations compared to that of oil drilling.
- Commenters emphasized that the community experienced disproportionate pollution burdens and that the Project would violate Section VI.A.4.c of General Order 177, which required consideration of relocating the project outside ESJ communities.
- Commenters raised concerns about potential health impacts on vulnerable populations in the ESJ community, and urged CEQA Staff to reject the Project in its entirety based on environmental justice concerns.
- Commenters emphasized the need for the Project to comply with environmental justice policies and regulations.
- Commenters highlighted the importance of considering cumulative impacts on the ESJ community.
- Commenters recommended that the project include measures to address the specific needs and concerns of the ESJ community.
- Commenters cited CalEnviroScreen data showing that the area surrounding the project site experienced a pollution burden higher than 87% of other California communities.
- Commenters expressed concern that the site was located across the street from E.P. Foster Elementary School, where the majority of students were Hispanic or Latino and a significant portion were English language learners.
- Commenters described the west side of Ventura as a community of color with a long history of environmental pollution and called for a comprehensive evaluation of health impacts.
- Commenters called for the relocation of the compressor station, citing its placement as an environmental injustice.
- Commenters highlighted the historical placement of polluting industries in marginalized communities and stressed the need to reverse this pattern.
- The County estimated that approximately 6,400 residents live within a half-mile of the project site, which is also located directly across from E.P. Foster Elementary School, where over 90% of students are Hispanic or Latino and 37% are English language learners.
- The County highlighted that in 2023, the Board of Supervisors designated parts of unincorporated North Ventura Avenue as a Disadvantaged Community, with the southernmost portion located 1.6 miles from the project site.

- The County emphasized that students from this area attend schools located less than one-third of a mile from the project site, and that two additional schools, five daycares, and four public parks are located within a one-mile radius.
- The County stated that both the City and County General Plans call for coordination with other agencies when siting potentially hazardous facilities near vulnerable populations.

4.1.4. Air Pollution and Health Effects

- Commenters raised concerns about San Joaquin Valley Fever due to fugitive dust during construction and argued that the PEA's dismissal of this danger was not supported by substantial evidence.
- Commenters raised concerns about the health impacts of air pollution from the compressor station, including respiratory diseases, asthma, nosebleeds, migraines, and other illnesses.
- Commenters noted that a high percentage of students at nearby E.P. Foster Elementary School suffered from asthma and were particularly vulnerable to air quality impacts.
- Commenters recommended implementing stringent emission control measures to reduce the impact of air pollution on the community and to monitor and mitigate air pollution throughout construction and operation.
- Commenters emphasized the need for a detailed analysis of the proposed Project's potential air quality impacts and long-term health consequences.
- Commenters highlighted the importance of evaluating the Project's compliance with air quality standards and regulations.
- The Ventura County Air Pollution Control District (VCAPCD) recommended the use of Tier 4 off-road construction equipment and low-VOC paints to reduce emissions, and that the air quality portion of the Draft EIR should consider project consistency with the 2022 Air Quality Management Plan.
- The VCAPCD also suggested conducting a construction-based Health Risk Assessment for activities lasting more than six months.
- The Ventura County Air Pollution Control District recommended that the proposed Project designate the two proposed 2,500-horsepower electric compressor engines as the primary engines for facility operations, and limit use of the two 1,900-horsepower natural gas engines to secondary, backup roles, only to be used during emergencies or when the electric compressors are undergoing maintenance.
- The VCAPCD recommended that, if the odor impact analysis identifies significant effects on nearby sensitive receptors, the project should implement on-site mitigation measures such as continuous perimeter air sampling and monitoring for mercaptan and other natural gas indicators, increased inspection frequency, enhanced pressure alarm systems, and installation of carbon scrubbers or other odor control technologies.
- Commenters stressed that building new polluting infrastructure in the community would further harm public health and environmental justice.

4.1.4.1. Toxic Air Pollutants

- Commenters highlighted risks associated with the release of hazardous materials during construction and operation of the compressor station.
- Commenters emphasized the need for a thorough analysis of these risks and the implementation of stringent safety measures.

- Commenters recommended that the proposed Project include measures to prevent, monitor, and mitigate the release of hazardous materials.
- Commenters expressed concerns about the potential health impacts of exposure to hazardous substances, particularly for nearby residents and workers, and highlighted the need for the project to include protective measures for both workers and the surrounding community.
- Commenters stated that CEQA Staff should demonstrate, with quantifiable evidence, the risk of hazardous material release resulting from the proposed Project.
- CAUSE stated that unburned gas released during blowdown events may contain hazardous pollutants such as benzene, toluene, ethylbenzene, and xylenes, in addition to methane and urged that the EIR evaluate the potential health impacts of these emissions on populations living near the project site.
- A commenter requested long term studies at the site regarding potential health effects including cancer and asthma specifically related to the site.
- A commenter described a suite of studies that identified 70 air pollutants in compressor station emissions, 39 of which were linked to cancer, and that found high levels of VOCs near a compressor station in Ohio.

4.1.4.2. Methane

- Commenters emphasized the need for a thorough analysis of the health risks associated with methane emissions and leaks and expressed concerns about the potential long-term health impacts of methane exposure on the community.
- Commenters recommended that the project include measures to monitor and mitigate methane emissions.
- Commenters highlighted the need for the project to include protective measures for both workers and the surrounding community.
- Commenters described a 2017 NASA Methane statewide inventory that identified a methane plume at the Project site.

4.1.4.3. Greenhouse Gas Emissions, Climate Change

- Commenters expressed concern that the project would increase greenhouse gas emissions, potentially conflicting with California's climate legislation, including AB 32, SB 32, and AB 1279.
- Commenters urged CEQA Staff to analyze the Project's impact on these statutory provisions and the CPUC's decarbonization objectives.
- Commenters emphasized the need to evaluate the Project's alignment with the state's climate goals and to consider alternatives that would reduce emissions.

4.1.5. Public Safety

- The City of Ventura highlighted that the project site was located in a liquefaction hazard zone, increasing the risk of fire and explosion and argued that the PEA's dismissal of this hazard was not supported by substantial evidence.
- Commenters emphasized the need for stringent safety measures to protect the community from fire and explosion risks.
- Commenters expressed concerns about and recommended comprehensive safety protocols to prevent accidents during construction and operation.

- Commenters emphasized the importance of evaluating the Project's compliance with applicable safety regulations and highlighted the need for the project to include measures that protect both workers and the surrounding community from safety hazards.
- Commenters raised concerns about the compressor's proximity to E.P. Foster Elementary School and two daycare programs, and its potential impact on the health and safety of children and staff.
- Commenters urged the CPUC to study public health and safety concerns and consider alternative locations for the compressor station to protect the health and safety of the community.
- Commenters emphasized the need to reverse the historical placement of hazardous infrastructure in marginalized communities.
- Commenters stressed the need to evaluate the risks of gas explosions and emissions and to consider safer, cleaner alternatives.
- The Coalition expressed discontent with the PEA's hazard assessment and recommended a reassessment of the explosion risk of the proposed Project and its alternatives.

4.1.6. Noise

- Commenters emphasized the need for a thorough analysis of noise impacts and the implementation of mitigation measures to protect the community from noise pollution.
- Commenters expressed concerns about noise generated by the Project and its impact on nearby sensitive receptors, including schools and residential areas.
- Commenters emphasized the importance of evaluating the project's compliance with noise regulations.

4.1.7. Comments Outside of the Scope of CEQA

Non-environmental issues such as economic impacts and assessment of Project need are outside the scope of CEQA and will not be addressed in the EIR, although these issues may be addressed through the CPUC's concurrent proceeding for the proposed Project.

- Commenters raised concerns about the affordability crisis facing utility ratepayers and the concern that the proposed Project would increase the affordability crisis.
- Commenters questioned the need for the Project and its alignment with broader energy and environmental goals.
- The City of Ventura raised questions regarding the necessity of uninterrupted electric supply to the site, and thus the need for redundancy with two natural gas compressors. They also questioned whether the increase in capacity with the proposed Project was appropriate and could be served by electric compressors.
- Commenters argued that the project represented a waste of resources and funds and should be reconsidered in light of its questionable necessity.
- Commenters requested considering the risks of increasing gas storage at the La Goleta Gas Storage Facility.
- Cal Advocates questioned whether the size of the proposed Project is necessary to meet current and anticipated gas demand, and whether using fewer compressors would affect deliverability to La Goleta and the ability to serve ratepayers. As such, they recommended the Draft EIR disclose environmental impacts of compressors individually.
- The Coalition stated the EIR should analyze indirect impacts of the Project such as whether the proposed Project's operation would discourage electrification or otherwise perpetuate reliance on natural gas.

Attachment 1

NOTICE OF PREPARATION



California Public Utilities Commission



To: State Clearinghouse, Responsible and Trustee Agencies, Property Owners, and Interested Parties

From: John Forsythe, CPUC Project Manager

Subject: **NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING FOR THE VENTURA COMPRESSOR MODERNIZATION PROJECT**

(CPCN Application No. A.23-08-019)

Date: February 28, 2025

The Ventura Compressor Modernization Project (Proposed Project) is proposed by and would be constructed and operated by Southern California Gas Company (SoCalGas), a natural gas utility regulated by the California Public Utilities Commission (CPUC).

On August 24, 2023, pursuant to CPUC General Order 177, SoCalGas filed an Application for a Certificate of Public Convenience and Necessity (CPCN) for the Ventura Compressor Modernization (CPCN Application No. A.23-08-019). CPUC has reviewed and deemed the application complete. Pursuant to Rule 2.4 of CPUC's Rules of Practice and Procedure, the application package for a Certificate of Public Convenience and Necessity includes a Proponent's Environmental Assessment (PEA).

As lead agency under the California Environmental Quality Act (CEQA), the CPUC will prepare an Environmental Impact Report (EIR) to conduct an objective analysis of the effects of the Proposed Project in compliance with CEQA. The CPUC will use the EIR, in conjunction with other information prepared for the CPUC's record of this proceeding, to act on SoCalGas's application.

In order to obtain early feedback on the environmental issues to be addressed in the EIR, the CPUC is initiating the scoping process with a scoping period from February 28 through March 31, 2025.

WHAT IS SCOPING?

As required by CEQA, scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation. Accordingly, the CPUC is requesting comments to inform the actions, alternatives, mitigation measures, and environmental effects to be analyzed in the EIR. This notice includes a brief description of the Project, a brief summary of the anticipated potential impacts, information on public meetings, and how to provide input on the scope and content of the EIR. After the public scoping period has ended, a Scoping Report will be prepared to summarize the comments received.

This NOP and the Scoping Report will be included as an appendix to the Draft EIR and will also be available on the CPUC's website for the Project with other Project documents and reports, including SoCalGas's application and PEA. The CPUC's website for environmental review of the Project can be accessed at the following link or with the QR code: <https://ia.cpuc.ca.gov/environment/info/aspen/venturacompressor/vcm.htm>



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The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



PROJECT DESCRIPTION

The Proposed Project would modernize the Ventura Compressor Station, located at 1555 North Olive Street in the City of Ventura. The scope of the Proposed Project includes:

- (1) replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal HP (estimated horsepower), electric-motor-driven compressors (electric compressors), with zero nitrogen oxide (NOx) emissions, resulting in a “hybrid” compressor station;
- (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 to replace the existing west and south chain-link fence/block wall; and
- (6) implementing other ancillary site improvements, such as piping interconnection and storage tanks.

The existing compressor equipment and temporary office facilities would be decommissioned approximately one year after the new facility has become fully operational.

Alternatives

The application and PEA identify a range of alternatives to the Proposed Project. These include the “No Project Alternative,” the “Supplemental Electric-Driven Compressor Installation Only Alternative,” and three site alternatives.

Consideration of the No Project Alternative is mandatory in CEQA, and it contemplates the possibility of CPUC denying the application.

The Supplemental Electric-Driven Compressor Installation Only Alternative would leave the three existing natural gas compressors and install new electric compressors at the site. The operation of the compressor station would primarily utilize the electric compressors first and use the existing natural gas compressors only as needed. No removal of the existing equipment and buildings related to the natural gas compressors would occur. Construction of a new building to house the new electric compressors and the associated improvements and infrastructure necessary would be completed as part of this alternative.

The three site alternatives would have SoCalGas constructing and operating the new project components at one of three new sites, as follows:

- Avocado Site. Approximately 15-acre agricultural site designated for open space uses and zoned for agriculture located approximately 3,000 feet west of the existing compressor station within the County of Ventura.
- Devil’s Canyon Road. Approximately 12.88-acre oil extraction site designated for open space uses and zoned for agriculture, located approximately 6,000 feet to the north of the existing compressor station on the west side of State Route 33 within the County of Ventura.
- Ventura Steel. Approximately 10-acre industrial site with oil extraction infrastructure designated and zoned for industrial uses located approximately 8,000 feet north of the existing compressor station within the County of Ventura.

High-level analysis of the alternatives appears in PEA Section 6, Comparison of Alternatives. Under the Proposed Project and each of the three site alternatives, the existing compressor equipment would be decommissioned approximately one year after the new facility has become fully operational.

LOCATION

The Proposed Project is located on an approximately 8.42-acre property at 1555 North Olive Street in the City of Ventura, California. The Project would include replacement of existing natural-gas-driven compressors, construction of

associated facilities and site improvements at the existing compressor station site. The existing compressor equipment at the site would be decommissioned approximately one year after the new facility has become fully operational.

The surrounding area includes industrial uses, a school, and residential parcels. One residential parcel is adjacent to the northeast corner of the Project site fronting North Olive Street. The E.P. Foster Elementary School is located across North Olive Street to the east of the Project site.

A map of the Proposed Project site and potential site alternatives is provided in Attachment A.

Applicant Proposed Measures and Best Management Practices

The proposed modernization of the existing SoCalGas compressor station would include environmental protections in the form of project best management practices (BMPs). The CPUC treats the Project BMPs as “Applicant Proposed Measures” to be incorporated into SoCalGas’s design of the Proposed Project. These measures are considered binding and integral to the Proposed Project design. The following types of BMPs were identified by SoCalGas as part of their application:

- Air Quality: Emissions Minimization during Construction.
- Biological Resources: Pre-Construction Nesting Bird Survey and Avoidance.
- Cultural Resources: Inadvertent Discovery of Archaeological Resources.
- Hazards, Hazardous Materials, and Public Safety: Updated Plans; and Building and Safety Permits.
- Hydrology and Water Quality: Stormwater Pollution Prevention Program.
- Noise: Compliance with Noise Ordinance.
- Transportation: Construction Traffic Control Plan; and Maintenance of Project Access Roads.

PROBABLE ENVIRONMENTAL EFFECTS OF THE PROJECT

The PEA prepared by SoCalGas does not identify any significant impacts from construction or operation of the Proposed Project. The EIR will independently and objectively evaluate the potential environmental effects of the Project and the need for mitigation.

Pursuant to Section 15123(b)(2) of the CEQA Guidelines, an EIR shall identify areas of controversy known to the lead agency including issues raised by agencies and the public. Natural gas compressor stations help maintain the flow of natural gas through pipelines. Primary topics of concern include air pollution, greenhouse gas emissions, and public safety.

The following issues identified in CEQA Guidelines Appendix G are known to the CPUC and will be addressed in the EIR for their potential environmental effects, as summarized below.

- Aesthetics: The Project site is located within the City of Ventura, slightly east of SR-33. The EIR will evaluate the potential for substantial adverse impacts to the existing visual character or quality of public views and the effects of new sources of light and glare.
- Agriculture resources: The SoCalGas property is not categorized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The property is not subject to a Williamson Act contract, nor is it zoned for agricultural use.
- Air quality: The EIR will evaluate the potential for the Project to conflict with or obstruct implementation of an applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
- Biological resources: The Project site is developed and has been previously disturbed. The potential presence of sensitive vegetation communities and habitats identified in local plans, policies, or regulations, or as designated by CDFW or USFWS, including wetlands and riparian habitat, will be assessed and potential effects will be evaluated in the EIR. The EIR will also evaluate the Project’s potential for effects on special-status and migratory species and conflicts with local regulations that protect biological resources.

- Cultural resources: The Project site has been previously disturbed by modern development, and a portion of the site has undergone soil remediation, including excavations up to 40 feet in depth, backfilled with clean fill soil. Preliminary records searches and surveys have not identified any archaeological or unique archaeological resources. No historical resources have been identified within the Project site. The potential for an adverse change in the significance of cultural resources will be evaluated in the EIR.
- Energy: The EIR will evaluate the potential for the Project to result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation.
- Geology, soils, and paleontological Resources: The Project is not located within, but is located within one mile of an Alquist-Priolo Zone, indicating that the potential for surface rupture is low. Additionally, due to the topography, there are no potential landslide hazards on the Project site. The EIR will evaluate the potential for the Project to result in substantial soil erosion, lateral spreading, subsidence, liquefaction, or collapse. Potential effects on paleontological resources will also be evaluated.
- Greenhouse gas emissions: The EIR will evaluate the potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on a quantified analysis of emissions associated with construction and operation, including fugitive emissions and blowdowns.
- Hazards, hazardous materials, and public safety: The Project components would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The EIR will evaluate the potential for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or a reasonably foreseeable accident.
- Hydrology and water quality: The Project site is located approximately 900 feet east of the Ventura River floodplain (i.e., the edge of the flood control levee) and approximately 1,200 feet east of the primary Ventura River channel within the Ventura River Watershed. The Project site is underlain by the Ventura River Valley – Lower Ventura River Groundwater Basin. The EIR will evaluate the potential for the Project to substantially degrade surface or groundwater quality, impede sustainable groundwater management, alter existing drainage patterns, or risk release of pollutants due to flooding.
- Land use and planning: Project components proposed by SoCalGas would not be subject to local discretionary land use or planning regulations, and the CPUC has preemptive jurisdiction of the Project. The EIR will evaluate the potential effects of the Project related to any conflicts with the existing City of Ventura General Plan, municipal code, and other applicable land use plans, policies, and regulations.
- Mineral resources: The EIR will address the potential for the Project to result in the loss of availability of a known mineral resource based on location on or near mining claims, active mines, resources recovery sites, or mapped mineral resource zones.
- Noise: The EIR will evaluate whether the Project would result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies and the potential for construction to generate excessive ground borne vibration.
- Population and housing: The Project does not propose new housing, businesses, or other land use changes, including roads or infrastructure, that would induce population growth in the area. Construction and operation of the Project would not displace any people or housing.
- Public services: The Project would not involve developing new residential units or services that would generate a new daytime or residential population in the area that would increase the demand for public services.
- Recreation: The Project would not involve the development or demolition of housing or otherwise generate a residential population that could impact existing parks or recreational facilities.
- Traffic and transportation: The EIR will evaluate the potential for the Project to conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; create potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations; generate vehicle miles traveled; and result in inadequate emergency access.
- Tribal cultural resources: The Project's potential effects on tribal cultural resources will be evaluated by the CPUC during tribal consultation conducted pursuant to Public Resources Code Section 21080.3.

- Utilities and service systems: The Project would require on site improvements for utilities such as water, stormwater, telecommunications, and natural gas. These improvements would be on site and would not cause an increase in demand related to wastewater generation, power, natural gas, or telecommunications as a result of the Project. The EIR will evaluate the potential for the Project to result in new or expanded utility facilities that are not identified as part of the Project, which could cause additional environmental effects.
- Wildfire: The SoCalGas project site and staging area are not located within a State Responsibility Area or a high Fire Hazard Severity Zone. The nearest high or very high Fire Hazard Severity Zones are approximately 950 feet from the site. The EIR will evaluate the potential for the Project to exacerbate wildfire hazard or expose people to wildfire related hazards (i.e., pollutants, flooding, landslides).

Public Resources Code Section 21092.6(a)

Per Public Resources Code Section 21092.6(a), if the Project site or site of any project alternative to be analyzed is a site listed on the "Cortese list" of hazardous waste site, then this information must be included in the NOP. The Cortese list includes public databases maintained by the State of California pursuant to Government Code Section 65962.5.

The PEA discloses that the Proposed Project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. According to SoCalGas, the Proposed Project site is listed twice on the List of Leaking Underground Storage Tank (LUST) Sites from the State Water Resources Control Board (SWRCB) GeoTracker database (Health and Safety Code Section 25295). The CPUC will confirm this and whether the Proposed Project site or alternative sites are listed on any other databases that meet the Cortese list requirements.

ISSUES THAT WILL NOT BE ADDRESSED IN THE EIR

Non-environmental issues such as the costs of the project and the assessment of project need are outside the scope of CEQA and will not be addressed in the EIR. These issues may be addressed through the CPUC's concurrent general proceeding for the Proposed Project ([A.23-08-019](#)), as required by CPUC General Order 177.

The Project site is located in a disadvantaged community, as designated by the California Environmental Protection Agency (Health and Safety Code Section 39711). According to CPUC General Order 177, the application for the CPCN must explain how the Project would be consistent with the goals of the CPUC's Environmental & Social Justice Action Plan and discuss whether it would be possible to relocate the project outside such areas. Although environmental justice is not a topic in the consideration of environmental effects under CEQA, the EIR will disclose the CPUC procedures for consideration of environmental and social justice in the decision-making process.

SCOPING PERIOD

Information to be included in the EIR will be based in part on comments received during the scoping period. Responsible and trustee agencies under CEQA, other interested agencies and organizations, property owners, and members of the public will also have an opportunity to comment on the Draft EIR once it is issued. Pursuant to CEQA Guidelines Section 15103, the scoping period will be for 30 days following the release of this NOP. Accordingly, this scoping period closes at 5:00 p.m. on March 31, 2025. Please include the name, organization (if applicable), mailing address, and e-mail address of the contact person for all future notifications related to this process. Public comments will become part of the public record and will be published in a publicly available Scoping Report.

Please send your comments by mail to:

John E. Forsythe
Project Manager for the Ventura Compressor Modernization Project
CPUC Energy Division, CEQA and Energy Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Email: john.forsythe@cpuc.ca.gov
Phone: 916-217-5073

Or, via electronic mail: vcm_ceqa@aspenerg.com

SCOPING MEETINGS

To provide information about the Proposed Project and CEQA process, the CPUC will hold a virtual scoping meeting on March 11, 2025. For assistance with or questions about the virtual meeting, email: vcm_ceqa@aspeneg.com.

Zoom meeting will be held Tuesday, March 11, 2025

Virtual Scoping Meeting

Tuesday, March 11, 2025

6:00 p.m.

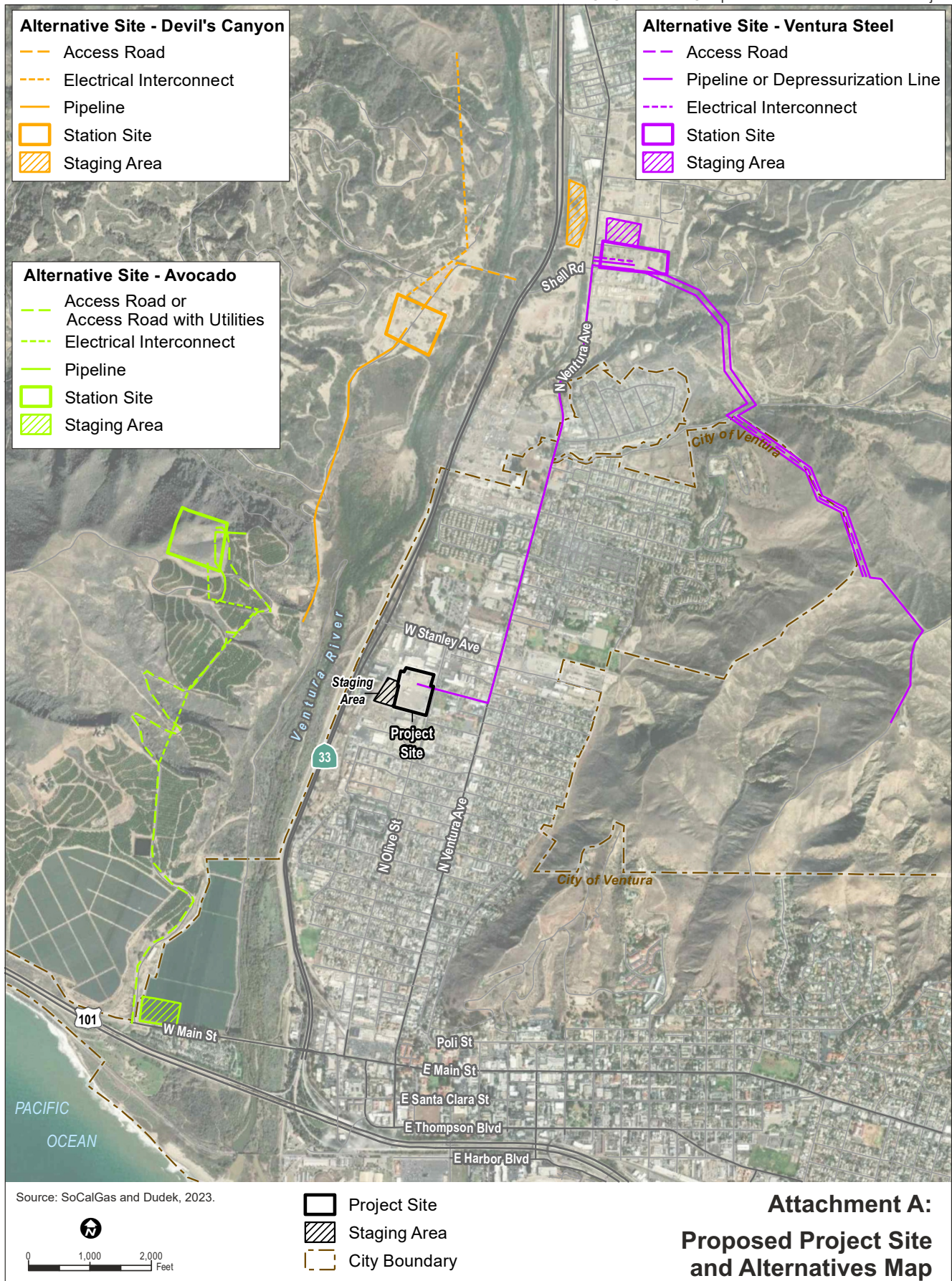
Attend via Zoom:

<https://us02web.zoom.us/j/81432321651>

Attend via phone: (669) 900-6833

Webinar ID: 814 3232 1651

Additional information about the Project is available in SoCalGas's application and supporting materials provided on the CPUC's website: <https://ia.cpuc.ca.gov/environment/info/aspern/venturacompressor/vcm.htm>



Attachment 2

AVISO EN ESPAÑOL



California Public Utilities Commission



Para: Centro de Intercambio de Información del Estado, Agencias Responsables y Fiduciarias, Dueños de Propiedades y Partes Interesadas

De: John Forsythe, Gestor de Proyectos de la CPUC

Asunto: AVISO DE PREPARACIÓN DE INFORME DE IMPACTO AMBIENTAL Y AVISO DE REUNIÓN DE ALCANCE PÚBLICO PARA EL PROYECTO DE MODERNIZACIÓN DE LA ESTACIÓN DE COMPRESIÓN DE VENTURA

(Solicitud de CPCN No. A.23-08-019)

Fecha: 28 de febrero de 2025

El Proyecto de Modernización de la Estación de Compresión de Ventura (el "Proyecto Propuesto") ha sido propuesto y sería construido y operado por Southern California Gas Company (SoCalGas), un servicio público de gas natural regulado por la Comisión de Servicios Públicos de California (CPUC, por sus siglas en inglés).

El 24 de agosto de 2023, conforme a la Orden General 177 de la CPUC, SoCalGas presentó una Solicitud de un Certificado de Conveniencia y Necesidad Pública (CPCN) para la Modernización de la Estación de Compresión de Ventura (Solicitud de CPCN No. A.23-08-019). La CPUC ha revisado la solicitud y considerado que está completa. Conforme a la Regla 2.4 de las Reglas de Actuación y Procedimiento de la CPUC, el paquete de solicitud para un Certificado de Conveniencia y Necesidad Pública incluye una Evaluación Ambiental del Proponente (PEA).

Como agencia principal conforme a la Ley de Calidad Medioambiental de California (CEQA), la CPUC preparará un Informe de Impacto Ambiental (EIR, por sus siglas en inglés) para realizar un análisis objetivo de los efectos del Proyecto Propuesto en cumplimiento de la CEQA. La CPUC utilizará el EIR, junto con otra información preparada para el expediente de la CPUC para este procedimiento, para actuar en lo relativo a la solicitud de SoCalGas.

Para obtener una retroinformación temprana sobre las cuestiones medioambientales que deben abordarse en el EIR, la CPUC está iniciando el proceso de alcance con un periodo de alcance del 28 de febrero al 31 de marzo de 2025.

¿QUÉ ES EL ALCANCE ("SCOPING")?

Tal como exige la CEQA, el alcance o *scoping* es el proceso de solicitar aportaciones del público y de agencias acerca del alcance y contenido de un EIR, antes de su preparación. En consecuencia, la CPUC solicita comentarios que informen las acciones, alternativas, medidas de mitigación y efectos medioambientales que se vayan a analizar en el EIR. Este aviso incluye una breve descripción del Proyecto, un resumen breve de los posibles impactos previstos, información sobre reuniones públicas, y cómo hacer aportaciones sobre el alcance y contenidos del EIR. Una vez haya finalizado el periodo de alcance público, se preparará un Informe de Alcance para resumir los comentarios recibidos.

Este Aviso de Preparación y el Informe de Alcance se incluirán como apéndice en el Borrador de EIR, y también estarán disponibles en el sitio web de la CPUC para el Proyecto, junto con otros documentos e informes sobre el Proyecto, incluyendo la solicitud de SoCalGas y la PEA. Se puede acceder al sitio web de la CPUC para la revisión ambiental del proyecto en el enlace siguiente o mediante el código QR:

<https://ia.cpuc.ca.gov/environment/info/aspen/venturacompressor/vcm.htm>



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La CPUC regula las compañías eléctricas, de gas natural, de telecomunicaciones, ferrocarriles, transporte por ferrocarril y transporte de pasajeros de propiedad privada.



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DESCRIPCIÓN DEL PROYECTO

El Proyecto Propuesto modernizaría la Estación de Compresión de Ventura, ubicada en el 1555 de North Olive Street en la Ciudad de Ventura. El alcance del Proyecto Propuesto incluye:

- (1) reemplazar tres compresores existentes de 1,100 caballos de fuerza (HP) impulsados por gas natural ("compresores de gas natural") con dos nuevos compresores de gas natural de 1,900 HP, equipados con tecnología de control de emisiones de última generación para cumplir con los estándares de la Mejor Tecnología de Control Disponible (BACT, por sus siglas en inglés), y dos nuevos compresores impulsados por motores eléctricos de 2,500 HP nominales (caballos de fuerza estimados) ("compresores eléctricos"), con cero emisiones de óxido de nitrógeno (NOx), con el resultado de una estación de compresión "híbrida";
- (2) construir un nuevo edificio de compresores de 10,458 pies cuadrados;
- (3) construir un nuevo edificio de oficinas permanente de 4,641 pies cuadrados;
- (4) construir un nuevo almacén de 5,459 pies cuadrados;
- (5) instalar un nuevo muro perimetral de bloques de 8 pies de altura para reemplazar la cerca de malla/muro de bloques existente al el oeste y al sur; y
- (6) implementar otras mejoras auxiliares del sitio, como la interconexión de tuberías y tanques de almacenamiento.

El equipo de compresión existente y las instalaciones de oficina temporales serían desmantelados aproximadamente un año después de que la nueva instalación esté completamente operativa.

Alternativas

La solicitud y la PEA identifican una gama de alternativas al Proyecto Propuesto, que incluyen la "Alternativa de No Realizar el Proyecto," la "Alternativa de Instalación Solo de un Compresor Suplementario impulsado por Energía Eléctrica," y tres ubicaciones alternativas.

La CEQA establece como obligatoria la consideración de la Alternativa de No Realizar el Proyecto, y contempla la posibilidad de que la CPUC deniegue la solicitud.

La Alternativa de Instalación Solo de un Compresor Suplementario impulsado por Energía Eléctrica dejaría los tres compresores de gas natural existentes e instalaría compresores eléctricos nuevos en el sitio. La operación de la estación de compresión utilizaría primero principalmente los compresores eléctricos y utilizaría los compresores existentes de gas natural solo si fuera necesario. No se produciría ninguna retirada del equipamiento existente y los edificios relacionados con los compresores de gas natural. Como parte de esta alternativa se completaría la construcción de un edificio nuevo para alojar los compresores eléctricos nuevos y las mejoras asociadas e infraestructura necesaria.

Las tres ubicaciones alternativas harían que SoCalGas construya y opere los componentes del nuevo proyecto en una de tres ubicaciones nuevas, a saber:

- Ubicación de Avocado. Ubicación agrícola de aproximadamente 15 acres, designada para usos en espacios abiertos y zonificada para agricultura, ubicada aproximadamente 3,000 pies al oeste de la estación de compresión existente dentro del Condado de Ventura.
- Devil's Canyon Road. Ubicación de extracción de petróleo de aproximadamente 12.88 acres designada para usos en espacios abiertos y zonificada para agricultura, ubicada aproximadamente 6,000 pies al norte de la estación de compresión existente en el lado oeste de la Ruta Estatal 33 dentro del Condado de Ventura.
- Ventura Steel. Ubicación industrial de aproximadamente 10 acres con infraestructura de extracción de petróleo, designada y zonificada para usos industriales ubicada aproximadamente 8,000 pies al norte de la estación de compresión existente dentro del Condado de Ventura.

En la Sección 6 de la PEA, "Comparación de Alternativas", aparece un análisis en profundidad de las alternativas. Según el Proyecto Propuesto y cada una de las ubicaciones alternativas, el equipo de compresores existente se desmantelaría aproximadamente un año después de que la nueva instalación esté plenamente operativa.

UBICACIÓN

El Proyecto Propuesto está ubicado en una propiedad de aproximadamente 8.42 acres en el 1555 de North Olive Street en la Ciudad de Ventura, California. El Proyecto incluiría el reemplazo de los compresores existentes de gas natural, la construcción de instalaciones asociadas y mejoras en el recinto en el sitio de la estación de compresión existente. El equipamiento de compresión existente en el sitio se desmantelaría aproximadamente un año después de que la nueva instalación esté plenamente operativa.

El área circundante incluye usos industriales, una escuela y parcelas residenciales. Una parcela residencial es adyacente a la esquina noreste de la ubicación del Proyecto, frente a North Olive Street. La Escuela Elemental E.P. Foster está ubicada al otro lado de North Olive Street al este del sitio del Proyecto.

En el Anexo A se ofrece un mapa del sitio del Proyecto Propuesto y posibles ubicaciones alternativas.

Medidas Propuestas y Buenas Prácticas de Gestión del Solicitante

La modernización propuesta de la estación compresora de SoCalGas existente incluiría protecciones ambientales en forma de buenas prácticas de gestión del proyecto (BMP, por sus siglas en inglés). La CPUC trata las BMP del Proyecto como "Medidas Propuestas por el Solicitante" que deben incorporarse en el diseño por parte de SoCalGas del Proyecto Propuesto. Estas medidas se consideran vinculantes y parte integrante del diseño del Proyecto Propuesto. SoCalGas identificó los siguientes tipos de BMP como parte de su solicitud:

- Calidad del Aire: Minimización de Emisiones durante la Construcción.
- Recursos Biológicos: Estudio y Evitación de Aves Nidificantes Antes de la Construcción.
- Recursos Culturales: Descubrimiento Inadvertido de Recursos Arqueológicos.
- Riesgos, Materiales Peligrosos y Seguridad Pública: Planes Actualizados y Permisos de Construcción y Seguridad.
- Hidrología y Calidad del Agua: Programa de Prevención de Contaminación de Aguas de Lluvia.
- Ruido: Cumplimiento con Ordenanza sobre Ruido.
- Transporte: Plan de Control de Tráfico de Construcción; y Mantenimiento de Carreteras de Acceso al Proyecto.

EFFECTOS AMBIENTALES PROBABLES DEL PROYECTO

La PEA preparada por SoCalGas no identifica ningún impacto significativo por la construcción u operación del Proyecto Propuesto. El EIR evaluará de forma independiente y objetiva los posibles efectos ambientales del Proyecto y la necesidad de mitigación.

Conforme a la Sección 15123(b)(2) de las Directrices de CEQA, los EIR deben identificar áreas de controversia conocidas para la agencia principal, incluyendo cuestiones planteadas por agencias y el público. Las estaciones compresoras de gas natural ayudan a mantener el flujo de gas natural por los gasoductos. Los motivos de preocupación principales incluyen contaminación del aire, emisiones de gases de efecto invernadero y seguridad pública.

Las siguientes cuestiones, identificadas en el Apéndice G de las Directrices de CEQA, son conocidas para la CPUC y sus posibles efectos ambientales se abordarán en el EIR, como se resume a continuación:

- Estética: El sitio del Proyecto está ubicado dentro de la Ciudad de Ventura, ligeramente al este de la SR-33. El EIR evaluará el potencial de impactos adversos sustanciales sobre el carácter visual o la calidad existentes de las vistas públicas y los efectos de nuevas fuentes de luz y deslumbramiento.
- Recursos agrícolas: La propiedad de SoCalGas no está categorizada como Tierra Agrícola de Primera, Tierra Agrícola Única ni Tierra Agrícola de Importancia Estatal. La propiedad no está sujeta a un contrato conforme a la Ley Williamson, ni está zonificada para uso agrícola.
- Calidad del Aire: El EIR evaluará el potencial de que el Proyecto esté en conflicto o suponga un obstáculo para la implementación de un plan de calidad del aire aplicable, tenga como resultado un incremento neto considerable desde el punto de vista acumulado de cualquier criterio de contaminante que para la región suponga no alcanzar un estándar de calidad del aire ambiental federal o estatal aplicable, exponga a receptores sensibles a concentraciones sustanciales de contaminantes, o tenga como resultado otras emisiones (como aquellas que causen olores) que afecten de forma adversa a un número sustancial de personas.

- Recursos biológicos: El sitio del Proyecto está urbanizado y ha sido modificado previamente. Se evaluará la presencia potencial de comunidades de vegetación y hábitats sensibles identificados en planes, políticas y regulaciones locales, o según designaciones de CDFW o USFWS, incluyendo humedales y hábitat ribereño, y se evaluarán los efectos potenciales en el EIR. El EIR también evaluará el potencial de que el Proyecto tenga efectos sobre especies con situación especial y migratorias y entre en conflicto con regulaciones locales de protección de recursos biológicos.
- Recursos culturales: El sitio del Proyecto ha sido modificado previamente por desarrollo moderno, y en una parte del sitio se ha realizado recuperación del suelo, incluyendo excavaciones de hasta 40 pies de profundidad, rellenadas con tierra limpia de relleno. Las búsquedas y estudios de registros preliminares no han identificado ningún recurso arqueológico ni arqueológico único. No se han identificado recursos históricos dentro del sitio del Proyecto. En el EIR se evaluará el potencial de un cambio adverso en la importancia de recursos culturales.
- Energy: El EIR evaluará el potencial de que el Proyecto tenga como resultado un impacto significativo sobre el medio ambiente debido a consumo de recursos energéticos derrochador, ineficiente o innecesario durante la construcción u operación del Proyecto.
- Geología, suelos y recursos paleontológicos: El Proyecto no está ubicado en el interior, pero está ubicado a una milla de una Zona Alquist-Priolo, que indica que el potencial de ruptura de superficie es bajo. Además, debido a la topografía, no hay posibles riesgos de deslizamiento de tierra en el sitio del Proyecto. El EIR evaluará el potencial de que el Proyecto tenga como resultado una erosión sustancial del suelo, extensión lateral, subsidencia, licuefacción o hundimiento. También se evaluarán los posibles efectos sobre recursos paleontológicos.
- Emisiones de gases de efecto invernadero: El EIR evaluará el potencial de que el Proyecto genere emisiones de gases de efecto invernadero, ya sea directa o indirectamente, que puedan tener un impacto significativo sobre el medio ambiente, basándose en un análisis cuantificado de emisiones asociadas con la construcción y la operación, incluyendo emisiones fugitivas y venteos.
- Riesgos, materiales peligrosos y seguridad pública: Los componentes del Proyecto estarían ubicados en un sitio que está incluido en una lista de ubicaciones de materiales peligrosos, compilada en aplicación de la Sección 65962.5 del Código de Gobierno. El EIR evaluará el potencial de que el Proyecto cree un riesgo significativo para el público o para el medio ambiente mediante el transporte, uso o eliminación rutinarios de materiales peligrosos, o un accidente razonablemente previsible.
- Hidrología y calidad del agua: El Proyecto está ubicado aproximadamente 900 pies al este de la llanura inundable del río Ventura (i.e., el borde del dique de control de inundaciones) y aproximadamente 1,200 pies al este del canal principal del río Ventura, dentro de la cuenca del río Ventura. El sitio del Proyecto descansa sobre el valle del río Ventura— la cuenca de aguas subterráneas del río Ventura. El EIR evaluará el potencial de que el Proyecto degrade sustancialmente la calidad de las aguas superficiales y subterráneas, impida la gestión sostenible de las aguas subterráneas, modifique los patrones de drenaje existentes, o corra el riesgo de escape de contaminantes debido a inundaciones.
- Usos y planeamiento del suelo: Los componentes del Proyecto propuesto por SoCalGas no estarían sujetos a regulaciones locales discrecionales sobre uso o planeamiento del suelo, y la CPUC tiene jurisdicción preferencial sobre el Proyecto. El EIR evaluará los efectos potenciales del Proyecto en relación con cualquier conflicto con el Plan General de la Ciudad de Ventura existente, su código municipal y otros planes, políticas y regulaciones aplicables sobre uso del suelo.
- Recursos minerales: El EIR abordará la posibilidad de que el Proyecto tenga como resultado la pérdida de disponibilidad de un recurso mineral conocido, basándose en la ubicación en las proximidades o en explotaciones mineras, minas activas, sitios de recuperación de recursos, o zonas de recursos minerales cartografiadas.
- Ruido: El EIR evaluará si el Proyecto daría lugar a exposición de las personas a niveles de ruido que excedan los estándares que fija el plan general u ordenanza de ruido locales, o los estándares aplicables de otras agencias, o generación de dichos niveles, y el potencial de que la construcción genere vibraciones excesivas transmitidas por el suelo.
- Población y vivienda: El Proyecto no propone nuevos negocios, viviendas ni otros cambios en el uso del suelo, incluyendo caminos o infraestructura, que induciría crecimiento de población en el área. La construcción y la operación del Proyecto no desplazarían a ninguna persona ni vivienda.

- Servicios públicos: El Proyecto no implicaría desarrollar unidades residenciales ni servicios nuevos que generarían una población nueva durante el día o residencial en el área que incrementara la demanda de servicios públicos.
- Recreación: El Proyecto no implicaría el desarrollo ni demolición de viviendas, ni generaría de otro modo una población residencial que pudiera afectar a los parques o instalaciones recreativas existentes.
- Tráfico y transporte: El EIR evaluará el potencial de que el Proyecto esté en conflicto con cualquier programa, plan, ordenanza o política que aborde el sistema de circulación, incluyendo transporte público, carreteras, instalaciones para bicicletas o peatones; cree condiciones potencialmente peligrosas para personas que caminen, se desplacen en bicicleta o en automóvil, o para las operaciones de transporte público; haga que se recorran millas en vehículos; y dé lugar a acceso inadecuado para emergencias.
- Recursos culturales tribales: Los efectos potenciales del Proyecto sobre los recursos culturales tribales serán evaluados por la CPUC durante consultas tribales, conforme a la Sección 21080.3 del Código de Recursos Públicos.
- Sistemas de Servicios y Suministros Públicos: El Proyecto requeriría mejoras en el sitio para servicios públicos como agua, aguas pluviales, telecomunicaciones y gas natural. Estas mejoras serían en el sitio y no causarían un aumento de la demanda en relación con generación de aguas residuales, electricidad, gas natural o telecomunicaciones como resultado del Proyecto. El EIR evaluará el potencial de que el Proyecto tenga como resultado instalaciones de servicios nuevas o ampliadas que no estén identificadas como parte del Proyecto que pudieran causar efectos adicionales sobre el medio ambiente.
- Incendios Forestales: El sitio del proyecto de SoCalGas y el área de preparación no están ubicados dentro de un Área de Responsabilidad Estatal o una Zona de Alta Gravedad de Peligro de Incendio. Las zonas de Alta Gravedad de Peligro de Incendio más cercanas están aproximadamente a 950 pies del sitio. El EIR evaluará el potencial de que el Proyecto agrave el riesgo de incendios forestales o exponga a las personas a riesgos relacionados con incendios forestales (esto es, contaminantes, inundaciones, deslizamientos de tierra).

Sección 21092.6(a) del Código de Recursos Públicos

Según la Sección 21092.6(a) del Código de Recursos Públicos, si el sitio del Proyecto, o el sitio de cualquier alternativa al proyecto que haya de analizarse, son una ubicación incluida en la “lista Cortese” de ubicaciones de residuos peligrosos, en ese caso esta información debe incluirse en el Aviso de Preparación. La lista Cortese incluye bases de datos públicas mantenidas por el Estado de California, en aplicación de la Sección 65962.5 del Código de Gobierno.

La PEA revela que el Proyecto Propuesto estaría ubicado en un lugar que está incluido en una lista de ubicaciones de materiales peligrosos, compilada en aplicación de la Sección 65962.5 del Código de Gobierno. Según SoCalGas, el sitio del Proyecto Propuesto aparece dos veces en la Lista de Sitios de Tanques Subterráneos de Almacenamiento con Fugas (LUST) de la base de datos GeoTracker de la Junta Estatal de Control de Recursos Hídricos (SWRCB) (Sección 25295 del Código de Salud y Seguridad). La CPUC confirmará esto y si el sitio del Proyecto Propuesto o las ubicaciones alternativas aparecen en cualquier otra base de datos que cumpla los requisitos de la lista Cortese.

CUESTIONES QUE NO SE ABORDARÁN EN EL EIR

Las cuestiones no relacionadas con el medio ambiente, tales como los costos del proyecto y la evaluación de la necesidad del proyecto, quedan fuera del ámbito de CEQA y no se abordarán en el EIR. Estas cuestiones pueden ser abordadas mediante el procedimiento general concurrente de la CPUC para el Proyecto Propuesto ([A.23-08-019](#)), según exige la Orden General 177 de la CPUC.

El sitio del Proyecto está ubicado en una comunidad desfavorecida, según la designación de la Agencia de Protección Ambiental de California (Sección 39711 del Código de Salud y Seguridad). Conforme a la Orden General 177 de la CPUC, la solicitud de CPCN debe explicar la forma en que el Proyecto estaría en consonancia con los objetivos del Plan de Acción de Justicia Ambiental y Social de la CPUC y analizará si sería posible reubicar el proyecto fuera de dichas áreas. Aunque la justicia ambiental no está incluida en la consideración de efectos medioambientales conforme a CEQA, el EIR revelará los procedimientos de la CPUC para tener en consideración la justicia ambiental y social en el proceso de toma de decisiones.

PERIODO DE ALCANCE

La información que haya de incluirse en el EIR se basará en parte en los comentarios recibidos durante el periodo de alcance. Las agencias responsables y fiduciarias conforme a CEQA, otras agencias y organizaciones interesadas, dueños de propiedades y miembros del público también tendrán una oportunidad para hacer comentarios sobre el Borrador de EIR una vez se haya emitido. En aplicación de la Sección 15103 de las Directrices de CEQA, el periodo de alcance será de 30 días tras la publicación de este Aviso de Preparación. Por tanto, este periodo de alcance se cierra a las 5:00 p.m. del 31 de marzo de 2025. Por favor, incluyan el nombre, organización (si aplica), dirección postal y dirección de correo electrónico de la persona de contacto para todos los avisos futuros relacionados con este proceso. Los comentarios del público serán de dominio público, y se publicarán en un Informe de Alcance a disposición pública.

Favor de enviar sus comentarios por correo electrónico a:

John E. Forsythe
Project Manager for the Ventura Compressor Modernization Project
CPUC Energy Division, CEQA and Energy Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Correo electrónico: john.forsythe@cpuc.ca.gov

Teléfono: 916-217-5073

O por correo electrónico: vcm_ceqa@aspenerg.com

REUNIONES DE ALCANCE

A fin de proporcionar información sobre el Proyecto Propuesto y el proceso CEQA, la CPUC celebrará una reunión virtual de alcance el 11 de marzo de 2025. Si desea ayuda o tiene preguntas sobre la reunión virtual, escriba un correo electrónico a la dirección: vcm_ceqa@aspenerg.com.

La reunión mediante Zoom se celebrará el martes, 11 de marzo de 2025

Reunión Virtual de Alcance

Martes, 11 de marzo de 2025

6:00 p.m.

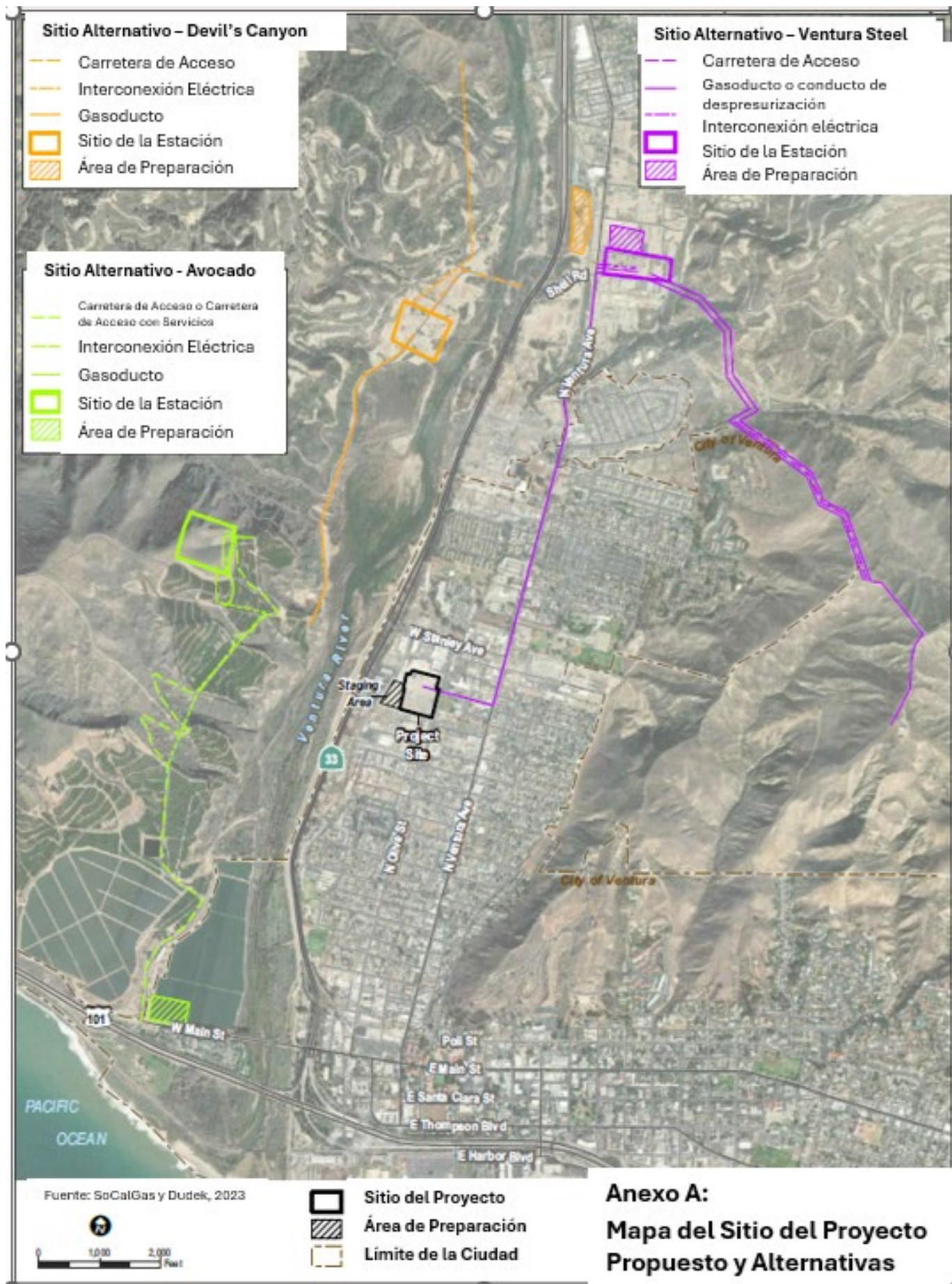
Para asistir mediante Zoom: <https://us02web.zoom.us/j/81432321651>

Para asistir por teléfono: (669) 900-6833

ID de Reunión: 814 3232 1651

Hay información adicional sobre el Proyecto disponible en la solicitud de SoCalGas y los materiales de apoyo, que pueden consultarse en el sitio web de la CPUC:

<https://ia.cpuc.ca.gov/environment/info/asp/venturacompressor/vcm.htm>



Attachment 3

SCOPING MEETING PRESENTATION

CPUC A.23-08-019 Proceeding

Ventura Compressor Modernization Project

Webpage: [Ventura Compressor Station Modernization Project: Home](#)

CEQA Scoping Meeting

California Public Utilities Commission,
Energy Division



California Public
Utilities Commission



*Please note that this meeting will be recorded

Meeting Guidelines

- All attendees will be muted during the presentation.
- Please note that the **CHAT** box will be monitored, but questions will not be answered live. If you have a question, please reach out to the CPUC via email at: vcm_ceqa@aspeneg.com
- You may submit a written scoping comment via **CHAT** box if you wish, but email is preferred.
- If you would like to make an **oral scoping comment**, please wait until the end of the presentation. When we ask for scoping comments, use the **RAISE HAND** feature and we will call on you to speak.
- **Note:** This meeting is being recorded.

Scoping Meeting Agenda

- Introductions
- Purpose of the Meeting
- Application and Permitting Process
- Environmental Review Process (CEQA)
- Project Overview
- Scoping: Environmental Impacts and Alternatives
- Public Comments
- Next Steps



Introductions

State Lead Agency (CEQA):

- California Public Utilities Commission (CPUC)
 - Michelle Wilson, CPUC Program Supervisor
 - John Forsythe, CPUC Project Manager

CEQA Consultant:

- Aspen Environmental Group
 - Brewster Birdsall, Aspen Project Manager
 - Grace Weeks, Aspen Associate Scientist

Project Applicant:

- Southern California Gas Company (SoCalGas)



Purpose of this Meeting



To inform the public, agencies, and interested parties about the project and the environmental review process.

To receive input to inform the scope and content of the environmental review and identify issues of concern.

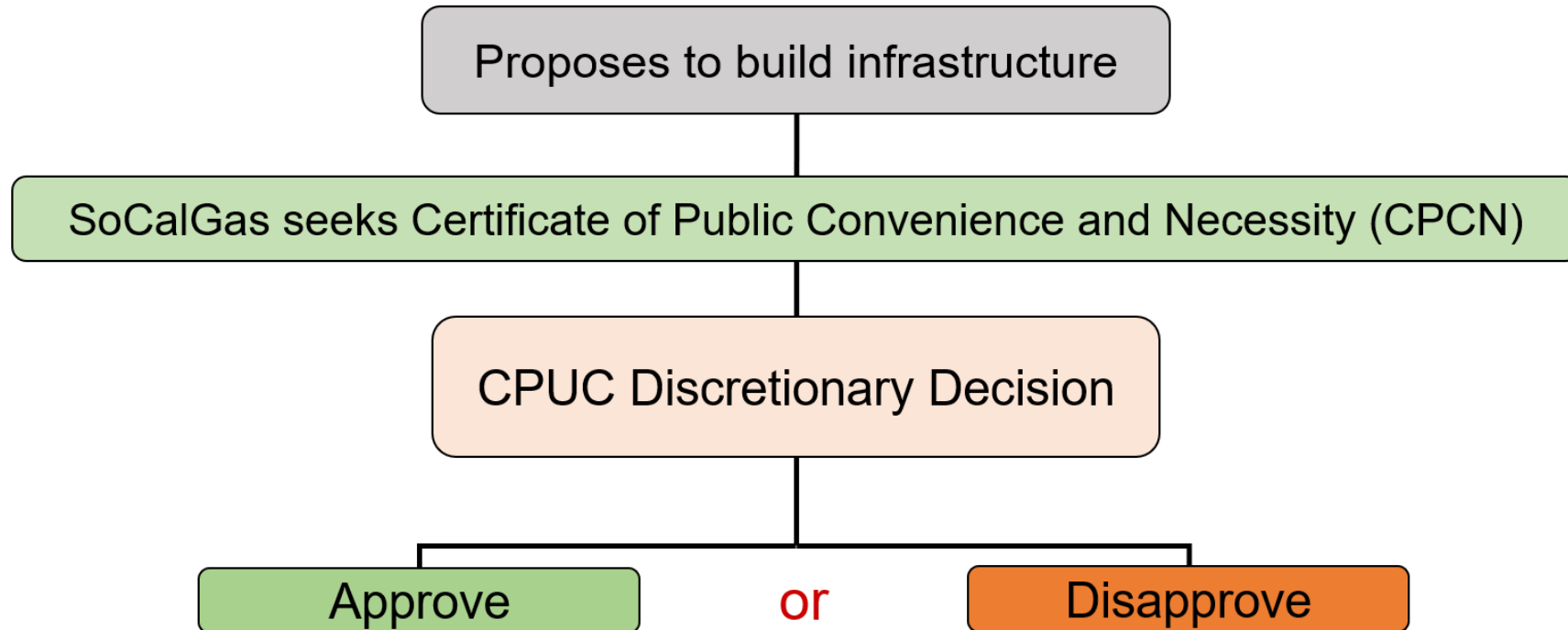
Your ideas are welcome and invited!

What is Scoping?

- Scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation.
- CPUC is requesting comments to inform the scope and content of the EIR and help identify the project actions, alternatives, environmental effects, and mitigation measures to be analyzed.

Application Process

Southern California Gas Company (SoCalGas)



CEQA Overview

- The California Environmental Quality Act
 - Inform decision makers and the public about the potential significant environmental effects of a proposed project
 - Identify ways that environmental damage can be avoided or significantly reduced
 - Prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures
 - Disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved
- Focus on physical impacts to the environment

CEQA EIR Process



CEQA: Project Description

- **Construction**

- What would be built
- How would the project be built
 - Construction methodology
 - Equipment required
 - Workers required
- Project schedule- duration/phases

- **Operations**

- How would the project be operated
- Operational personnel required

- **Maintenance**

- How is the project maintained
- When is maintenance performed
- Maintenance personnel required

Project Location

- City of Ventura
 - 1555 North Olive Street
- Industrial, with mix including residential and schools
 - E.P. Foster Elementary School

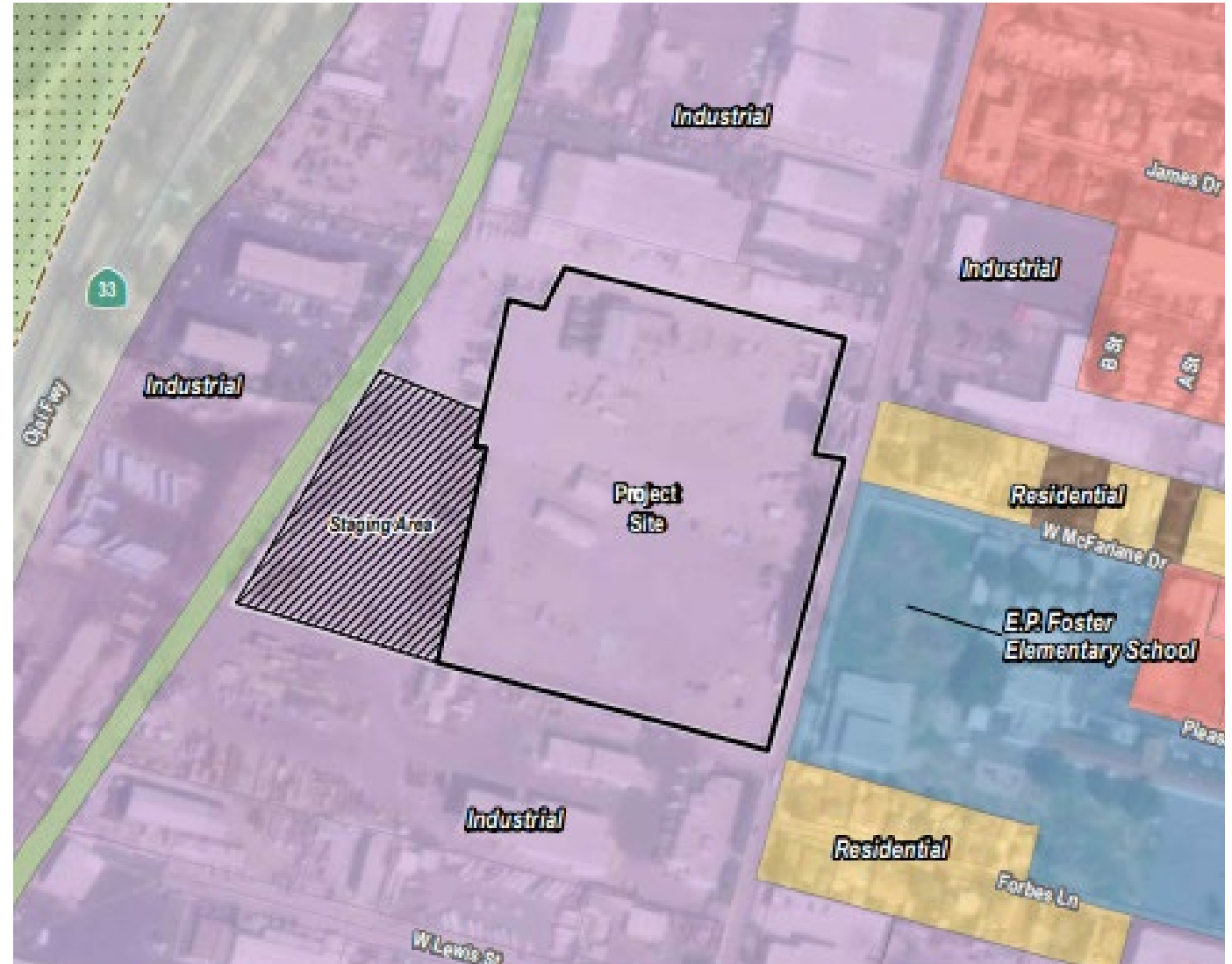
Land Use Designation (City of Ventura)

- Neighborhood Low
- Neighborhood Medium
- Neighborhood High
- Commerce
- Industry
- Public / Institutional
- Parks & Open Space
- Right of Way

- Project Site
- Staging Area
- City of Ventura

General Plan Land Use (County of Ventura)

- Open Space



CPUC's ESJ Action Plan

- The California Public Utilities Commission (CPUC) adopted an Environmental and Social Justice (ESJ) Action Plan 2.0 on April 7, 2022.
- The plan is designed to serve as a roadmap for expanding public inclusion in Commission decision making and improving services to ESJ communities.
- Environmental justice is the fair treatment and meaningful involvement of all people in development, implementation, and enforcement of environmental policies. The ESJ Action Plan Version 2.0 recognizes the disproportionate impacts of environmental hazards in communities of color and identifies ways the CPUC can use its regulatory authority to address funding and resources for these communities to mitigate the outcomes of past inequities and barriers.

Project Components

- Modernization of the existing Ventura Compressor Station, including:
 - replacing three existing 1,100 horsepower (HP) natural gas compressors with two new 1,900 HP natural gas compressors, and two new 2,500 nominal HP electric compressors, with zero nitrogen oxide (NOx) emissions, resulting in a “hybrid” compressor station;
 - erecting a new 10,458-square-foot compressor building;
 - erecting a new 4,641-square-foot permanent office building;
 - erecting a new 5,459-square-foot warehouse;
 - installing a new 8-foot-tall perimeter block wall to replace the existing west and south chain-link fence/block wall; and
 - implementing other ancillary site improvements, such as piping interconnection and storage tanks.

Existing – North Olive Street (facing west)



KOP 1 - Existing Conditions

Existing – West McFarlane Drive (facing west)



KOP 2 - Existing Conditions

Existing – North Olive Street (facing southwest)



KOP 3 - Existing Conditions

Existing – Ventura River Trail (facing east)



KOP 4 - Existing Conditions

Existing – Grant Park Ridgeline Trail (facing northwest)



KOP 5 - Existing Conditions

Proposed – Conceptual Site Plan



CEQA: Environmental Resource Areas

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

For Each Resource Area ...

- Define and Describe Existing Setting
 - Environmental setting
 - Regulatory setting
- Establish Thresholds of Significance
 - What defines a “significant” impact
- Identify Project Impacts and Mitigation
 - CPUC Mitigations
 - Significance after mitigation
- Evaluate Cumulative Impacts
- Impacts of Alternatives

CEQA: Project Alternatives

- Identify a range of reasonable alternatives to avoid or substantially lessen significant effects of the project
- Feasible
 - Legal, regulatory, technical
- Meet most basic project objectives

Project Objectives

SoCalGas has identified the following objectives for the Project:

- Meet system operational requirements by providing sufficient gas supply to the North Coastal System at adequate pressures year-round to reliably serve demand in the North Coastal System and inject into the La Goleta Storage Field.
- Promote system reliability and affordability by restoring the capability of replenishing the entire La Goleta Storage Field inventory during the summer operating season.
- Modernize the Ventura Compressor Station's aging infrastructure, which was designed and installed in the 1980s to meet operating requirements at that time, in support of year-round system reliability.

Project Objectives (continued)

- Provide resiliency through diversifying energy supply and improving station reliability.
- Reduce permitted nitrogen oxides (NOx) emissions at the facility by installing new compressors equipped with state-of-the art emissions control technology.
- Achieve Project functionality as soon as possible to support needed reliability.
- Maintain continuity of operations of the compressor station until the Project goes into service.
- Safeguard ratepayer funds by evaluating Project costs in a prudent manner and in accordance with CPUC direction.

Alternatives may include ...

- Those considered or suggested by:
 - SoCalGas and evaluated in application materials
 - Public/agencies during this scoping process
 - Developed by CPUC and CEQA team
- Project Alternatives:
 - Alternative Compressor Technologies
 - Relocation to Alternative Site
 - Other alternatives that meet most basic project objectives?
- “No Project” alternative

To Get Involved in the CEQA Process

- You're on the right track!
 - Please stay on and provide your scoping input
- Scoping Process
 - Notice of Preparation sent on February 28, 2025
 - Virtual scoping meeting on March 11, 2025: Comment period extended
 - In-person scoping meeting on April 15, 2025: Aviso en español
 - **Close of scoping period: April 30, 2025**
 - How to comment:
 - Verbally at this Scoping Meeting and/or by submitting a Comment Letter via Email
- Draft EIR
 - Anticipated release is October 2025

How to Submit a Scoping Comment

Public Comment Mailing Address:

John E. Forsythe, CPUC Project Manager
CPUC Energy Division, CEQA and Energy
Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Public Comment E-Mail Address:

John E. Forsythe, CPUC
Ventura Compressor Modernization
Project
vcm_ceqa@aspeneg.com

Scoping period will close on April 30, 2025.

Announcements of future events to come via email & project website.

Public Comments



Discussion Guidelines

- Be concise
- Stay on topic
- Respect others' opinions
- Comments will be recorded
- Written comments are encouraged

Public Comments

In Person

- Raise your hand to be called on

Via the Zoom Platform

- Click the Raise Hand icon to be called on



By Telephone

- Dial *9 to request to raise hand
- Dial *6 to unmute yourself when asked

Thank you for joining!

Public Comment Mailing Address:

John E. Forsythe, CPUC Project Manager
CPUC Energy Division, CEQA and Energy
Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Public Comment E-Mail Address:

John E. Forsythe, CPUC
Ventura Compressor Modernization
Project
vcm_ceqa@aspeneg.com

Webpage: [Ventura Compressor Station Modernization Project: Home](#)

Attachment 4

SCOPING MEETING TRANSCRIPTS

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT
March 11, 2025 Scoping Meeting Transcript
From: Recording.transcript.vtt (edited for clarity)

Brewster Birdsall: Hello, everyone I see about 14 or 15 or 20 participants on this Zoom call. My name is Brewster Birdsall. I'll wait a few minutes before we begin the presentation just to see if a couple of other folks like to join in on the webinar. So I'll just count down a minute or 2, and then I'll start a presentation. Thanks.

I see a good number of attendees filing in, up to about 28. I think I'll begin and go through some slides. I'd like to just start off by saying good evening and welcome to the Virtual Scoping Meeting for the Ventura Compressor Modernization Project. This meeting is being directed by the California Public Utilities Commission staff. This is a public meeting for all people interested in the Ventura Compressor Modernization Project. Today is March 11th, 2025. We are holding this virtual meeting on the Zoom platform.

Couple of important notes I want to say, right up – one, the meeting is being recorded for use by the agency during the proceeding for the project, and the presentation itself will be available online at the California Public Utilities Commission website for this project shortly after tonight's meeting. Another important, very important update upfront is to ensure the most robust public engagement and outreach, I want to let you all know that the CPUC is now planning to hold another similar meeting in the City of Ventura in the coming weeks. The date and time and location of that meeting has not yet been decided but this would be a scoping meeting of a of a very similar format to what we have here online. It will be in-person and I plan to be there and some of the other CPUC staff and consultants would be there as well. And in order to give us time to plan that meeting, the scoping period itself will be extended to close at a later date, and the date is still to be determined. My point is, all individuals with emails on record will be notified of the in-person meeting, date and location and the extension when those details are finalized. And I can talk a little bit more about this later on in the presentation.

So I'm going to move right along and jump to our next slide. I have some overall guidelines about this virtual meeting format. I expect that the presentation will last about 20 minutes and during the presentation, you may write in the chat window, and these notes will become part of the recording. But if you want to make a written comment on the project, please use the project email address that's shown on this website, on this page and also on the project website. This is vcm_ceqa@aspeneg.com. Excuse me.

In the Zoom format, the meeting will mute the participants lines until it is time for a public comment period, and that will be at the end of the presentation, like, I say, about 20 minutes long. And at the end of the meeting we'll ask you to raise your hand in the Zoom app, or press certain buttons on your phone if you would like to speak.

So advancing on to the agenda, here's the flow of tonight's meeting. Again, I expect our presentation to take about 20 minutes, and then a period of public comment will follow the presentation. This shows the basic steps, and I'm ready to move to the next slide.

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT
March 11, 2025 Scoping Meeting Transcript

1 This slide of introductions is to show you who we are and who do we represent and I'll try to
2 avoid using acronyms but some abbreviations do appear throughout the slides.

3 The scoping meeting is being directed by the staff at the Public Utilities Commission, and John
4 Forsyth is our project manager at the California Public Utilities Commission. The CPUC is the State
5 Regulator responsible for safe and reliable utility service at reasonable rates and for this project the
6 utility under review is the natural gas provider, Southern California Gas Company.

7 My name, as I mentioned in the beginning, is Brewster Birdsall and I am a project manager at
8 Aspen Environmental Group and the CPUC hired Aspen to prepare an environmental review that is
9 compliant with the California Environmental Quality Act, known as CEQA.

10 Grace Weeks is also here from Aspen helping facilitate the meeting and Aspen Environmental
11 Group will prepare an environmental impact report or EIR for the CPUC to use in reviewing this
12 project. The project applicant is SoCalGas. The applicant is seeking CPUC approval to construct and
13 operate the Ventura Compressor Modernization Project. The formal application was filed in August
14 2023 and supplemental information came in later to make it complete in late of 2024.

15 Thanks for advancing the slides. The overall purpose of the meeting is to give you information
16 on the process that CPUC must follow in developing this environmental impact report. The scoping
17 process allows us to hear your ideas on the scope and content of the environmental review and for
18 us to hear your issues of concern. Next.

19 What is scoping? When scoping meetings are required for projects that are of statewide or
20 regional significance, as this one is, later, we will give you direction on how to file your comments
21 on the scope and content of the environmental impact report that we are preparing and your
22 comments can help the CPUC identify environmental effects and possibly ways to mitigate the
23 effects, including alternatives to the project or mitigation measures as well.

24 So moving on to the overall process that we are sitting within, the applicant must follow certain
25 steps before the CPUC will decide to approve the new infrastructure and the environmental impact
26 report will be one of many considerations within the discretionary decision of approving or
27 disapproving the new infrastructure. Next slide shows an overview of the CEQA or California
28 Environmental Quality Act process and requirements, and our goal is to provide a written analysis
29 that is compliant with the requirements of CEQA.

30 The spirit of CEQA really centers on disclosure. Our audience is you, the public and the agency
31 decision makers and the environmental impact report will provide information on possible
32 environmental damage and how to avoid it. The law requires us to focus on how the project may
33 cause a direct or indirect physical change in the environment.

34 Moving on, the process of preparing an environmental impact report follows certain
35 predictable steps that sometimes take a year or more to fully complete and scoping is one of the
36 early steps. And the input we receive will help to shape the content of this environmental impact
37 report. After the draft environmental impact report becomes available, another round of public
38 review and public comment will occur – shown in that darker green box. We are here in the light
39 green area.

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT
March 11, 2025 Scoping Meeting Transcript

1 Okay, moving on to some of the important parts of the CEQA analysis. The environmental
2 impact report must include some mandatory components. One of the most important is the project
3 description. Our an analysis of environmental impacts will focus on these activities as they appear in
4 the project description, including the long-term maintenance and use of the facility over the life of
5 the project. The analysis will also describe how these activities may cause physical changes to the
6 environment including the site and its environment.

7 So moving on, I'll go into a little bit of the project itself, and the site of the project is an existing
8 natural gas compressor station. The site is zoned industrial, however, the site itself is adjacent to
9 sensitive land uses, including residential areas and the EP Foster Elementary School. This mix of land
10 uses makes the project challenging.

11 Here's the next slide. We can go on to one of these main issues. The California Public Utilities
12 Commission has what's called the Environmental and Social Justice Action Plan. The project site
13 here is located in a disadvantaged community which is a designation defined by the California
14 Environmental Protection Agency and when making its decision on this project, the CPUC will
15 consider whether the project is consistent with the goals of the CPUC's Environmental and Social
16 Justice Action Plan, adopted in 2022.

17 Now although environmental justice is not a topic in the consideration of environmental effects
18 under CEQA, the EIR will disclose the CPUC's procedures for consideration of environmental and
19 social justice in the overall decision-making process.

20 Next slide. This slide shows an overview of the different equipment that SoCalGas proposes to
21 construct and operate at the site. The project entails modernization of the Ventura Compressor
22 Station and in summary SoCalGas would upgrade the existing compressor station to modernize and
23 improve the reliability of this portion of California's natural gas transmission system, which extends
24 from the Ventura Compressor Station all the way through Santa Barbara, up the coast to Goleta and
25 to the north as far as communities around San Luis Obispo and Paso Robles.

26 The project would replace 3 older natural gas driven compressors with a new hybrid
27 configuration, composed of 2 electric and 2 gas driven compressors. The applicant, SoCalGas,
28 articulates its purpose and need for the project within their general application, which is available at
29 the CPUC website. For the following slides, I will quickly show some ground level views of the
30 existing site. Folks in the community, I'm sure, will be familiar.

31 First up is a view of the site along North Olive Street. The project would retain the fence along
32 North Olive Street, and new structures would become visible (next slide) along McFarlane, the
33 perimeter fence would remain the same. Again, new or taller structures would become visible. Next
34 is a quick view on an angle that shows the site from North Olive Street, facing more in a southwest
35 direction, and here this is an angle that shows the existing tan blowdown stack. It's partially
36 obscured by the fence to the right of the center, but the project would add a taller blowdown stack.

37 Another image, this time from the other direction on the Ventura River side of the site, over
38 the chain link fence, the exhaust stacks of the 3 existing compressor engines will appear just over
39 that that chain link fence on the left of this picture and you'll have a chance to look more closely at

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1 these pictures in the presentation when it's online. And also these pictures do come originally from
2 southern California gas companies application material which is also available on the project
3 website. Final view here of the environs is from the Ridgeline Trail at Grant Park, south of the site
4 looking more towards the north, the northwest, excuse me, and this just shows the general mix of
5 land uses in the area.

6 Final image is an aerial rendering of the conceptual site plan in the proposal, and the project
7 would add larger structures, including the new compressor building mainly along the western edge
8 of the site. The project would remove the existing compressor building which is on the northern
9 edge of the site.

10 Okay, thanks. Moving into some of the components of the environmental impact report, the
11 environmental impact report will include various chapters broken up into topic areas and the range
12 of topic areas, you can see here on this slide, will be comprehensive and this is common for an
13 environmental impact report. Moving to the next slide. The flow of each of the chapters in the EIR
14 would follow this general outline which describes the environmental setting for the project and the
15 regulatory framework that the project sits within, and then goes on to describe the significance of
16 the project effects on the environment and identification of mitigation or alternatives that may
17 avoid those impacts.

18 Next slide is a quick overview of alternatives. An important consideration is that the scope of
19 the EIR, and any EIR really, must include a range of alternatives. The range of alternatives, it is,
20 however, limited to those that meet most of the basic project objectives. So the project objectives
21 have a great importance in how alternatives are selected. The project objectives are specifically
22 articulated by the project applicant. On the next slide I have, well, on next 2 slides, we have an
23 overview of the project objectives. So here we have, this is the first of 2 slides of project objectives
24 articulated by SoCalGas. The CPUC must keep these objectives in mind when reviewing the possible
25 alternatives to the project.

26 As I mentioned earlier, any alternatives to the project that are carried forward for full analysis
27 must meet most of the basic project objectives, and on this first slide you may notice that SoCalGas
28 emphasizes reliably serving the north coastal portion of their system, that that geography of
29 multiple counties that I mentioned a moment ago. And this range of objectives here on the first
30 slide also includes moving gas into the Lagolita underground storage field. The second slide of
31 objectives here shows also that the company has an interest in reducing the levels of air pollutant
32 emissions from the from the facility, and also in completing the modernization in a timely manner.

33 So to talk a little bit more about alternatives that may satisfy the project objectives, the CPUC
34 will be actively exploring and comparing alternatives within the environmental impact report. The
35 reasonable range of alternatives could include alternative technologies and even a complete
36 relocation of the facility to an alternative site. Now, the environmental impact report must also
37 include an analysis of the No Project Alternative and that describes what could be reasonably
38 expected to occur, in the foreseeable future, if the project is not approved at all.

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Now, moving on to the conclusion of my short presentation. I want to point out that this slide will show, and it is showing a sequence of next steps, deliberately highlighted in an obnoxious color. I want to reiterate what we noted up front, which is that the CPUC is planning to hold another similar meeting in-person in the City of Ventura. Now the meeting, date and location are not yet set and the date and location will be announced to all people on the email list and also posted on the CPUC website for this project. At that meeting, we will also ensure that Spanish materials are available and that a Spanish translator will be available for the meeting. Additional time will also be added to the scoping period so the slide here shows that March 31st or April 1st would mark the end of a 30-day scoping period. Scoping comments will be accepted later as I mentioned just a moment ago, they will be accepted until a time after the in-person meeting that has yet to be scheduled. So I hope that's clear and I hope that that helps to provide folks on the line a little bit of an assurance that scoping is not being moved ahead hastily. Of course, we would encourage you to email your scoping comments earlier rather than later if you have them available.

So I'll move to the next slide which is specifically how to submit a scoping comment. And the best way is to email your comments to the address shown here, which is vcm_ceqa@aspeneg.com and when you file your comments, you should include your name and your organization, a mailing address and email address for, to be sure that you receive future notifications and the public comments will become part of the public record, and be published with the EIR in a scoping report. Again here want to just reiterate that the scoping period will be extended to a date to be determined. So this concludes my 20 minute presentation.

I want to transition to a period where we will open the mic, and I want to take a look at the Zoom app here to see how the participants are looking. This part of our Zoom presentation or our Zoom webinar will allow you to speak up and provide your public comments at this point in an open format. A couple of discussion guidelines here, to please be concise with your comments, try to stay on topic. We're here to talk about the scope and content of the environmental impact report that is to come and respect other's opinions to keep things civil, and bear in mind that the comments as this entire Zoom meeting is being recorded.

As I mentioned a moment ago, we encourage that comments be filed by email. That way, we can easily keep track of things, and you may have a chance to better articulate your points there. So to speak today, you would want to raise your hand in the Zoom app and moving here to the next slide (yep), we decided to allocate 2 minutes to folks who would like to speak up, and I see some hands being raised right now, which is great. I think that what will happen is as we count through the hands that are raised, your mic will be unmuted and you'll have a chance to address all who are listening and I mentioned in the beginning, we have staff online from the California Public Utilities Commission, including John Forsyth, our project manager and also online are, of course, representatives from Southern California Gas Company. This is really a comment period, however, so we encourage you to provide your thoughts, and we'll be listening.

Grace Weeks: Hello! So I will be the one unmuting you, so I will allow you to talk and then you have to unmute yourself. So on telephone, you will dial *9 to request to raise your hand and then *6 to unmute yourself when asked. So on the phone number, I'll shout out the last 4 digits and then for

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1 people who are signed in online, I'll say your name. I'm sorry if I mispronounce it in advance. I'll
2 allow you to talk, you unmute yourself and then you have 2 minutes so we'd also like you to state
3 your first and last name, although it's on here on Zoom for the people calling in, we'd like that for
4 the record. So Zoom keeps these in order so I'll just go from the top. Lane McCabe, I'm going allow
5 you to talk. Please unmute yourself.

6 **Lane McCabe:** Hello! My name is Lane McCabe. I live in Ventura and I work at the after school program
7 in EP Foster. My role includes supporting the student's educational growth as well as improving
8 their social development and their character. But the most important part of my job is to keep them
9 safe. I am deeply concerned about the potential expansion of the gas compressor, and I fear it could
10 put the health and safety of the children, myself and the other staff at risk.

11 I've worked at various school sites throughout Ventura, but one of the first things that I noticed
12 when I moved to EP Foster was that a large percentage of students suffer from asthma. I've also
13 noticed that the children at EP Foster tend to be sicker for longer, and they're sicker more often.

14 I'm not a medical professional but after various schools in Ventura, it's clear to me that the
15 health of the students at EP Foster is being negatively impacted. The main difference, I've noticed, is
16 the children are breathing in the toxic chemicals released by the gas compressor near their school
17 and near many of their homes in the same neighborhood.

18 It is crucial that the environmental review for this project carefully assess the impact of air
19 quality and how it affects the public health, particularly during the regular operation of the
20 compressor. More importantly, we need to prioritize the alternative locations for this facility. It
21 does not belong near a school or residential areas. Thank you very much for your time and attention
22 for this important issue.

23 **Grace Weeks:** Thank you Lane.

24 **Brewster Birdsall:** Thank you.

25 **Grace Weeks:** You reset this timer and I will lower your hand. All right. Okay, next up is Miles Hogan.
26 Please unmute yourself. You have 2 minutes.

27 **Miles Hogan:** Thank you for the presentation and good evening. My name is Miles Hogan. I'm a senior
28 assistant city attorney with the City of Ventura. I wanna thank you for holding this meeting and also
29 thank you for doing an in-person meeting in the coming weeks. We would request that at that
30 meeting that live Spanish interpretation be provided as well. The City is not going to provide any
31 comments at this time during the meeting but we are preparing and will submit comments during
32 the scoping period. Thank you.

33 **Grace Weeks:** Thank you, Miles, for your comment.

34 **Brewster Birdsall:** Thank you.

35 **Grace Weeks:** All right, next up is Lucia Marquez. I will unmute you or unmute yourself please and let
36 me reset the timer. Go ahead.

37 **Lucia Marquez:** All right. Good evening, my name is Lucia Marquez. I'm the policy director at CAUSE, a
38 community organization that has been organizing local residents in Ventura and Santa Barbara

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County for over 15 years. More specifically, Ventura. A lot of our work focuses on tenants, rights workers, rights and environmental justice. In Ventura our work has been focused on the west side of Ventura because of the long history of environmental pollution.

This is an area that's surrounded by oil wells, many of which leak toxins into our air and water. The longstanding operation of the nearby gas compressor also have caused years of methane leaks, and venting. As a result, it's no surprise that pollution mapping tools like CalEnviroScreen show that the census tract closest to the compressor ranks in the 87th percentile for pollution burden throughout the entire State. In addition to that, majority of residents in this census tract are also people of color.

Being here and speaking to you in this meeting is years in the making. In 2021, hundreds of Westside residents united to demand an environmental review before any decision could be made on this project. So I want to thank you but more importantly, highlight the need for that in-person meeting and we're really looking forward to it.

It's really essential that we evaluate the health impacts comprehensively. We know that our kids' health is being harmed. Children have higher rates of asthma, reoccurring nosebleeds, and we need to ask ourselves, like, what are the lifelong consequences for children whose bodies are developing that are exposed to high levels of methane for years and years. I encourage you to look at alternatives like electric or smaller compressor to reduce pollution burden.

I also wanted to highlight the issue around safety. Wildfires is a huge vulnerability to our community. Wildfires, like the Thomas Fire, are no longer rare events, they're our new normal. Uncontrolled wildfires in your homes is frightening enough, to add a compressor station to it, that's only asking for devastation so prioritizing alternative locations is something we wanted to uplift as well. Thank you.

Grace Weeks: Thank you.

Brewster Birdsall: Thank you very much.

Grace Weeks: Alright moving on. Let me reset this timer. Next is Lyra Cabanban. I'm unmuting you, go ahead.

Lyra Cabanban: Good evening, my name is Lyra and I am a student at Oxnard College and a fellow with CFROG. As an older sister to younger siblings, the idea of expanding this dangerous compressor station that is located across the street from an elementary school is deeply concerning. I am here today to urge you to do a few things.

First, I am urging you to thoroughly study and consider the public safety concerns related to this proposed expansion in the Environmental Impact Report. Compressor stations are at high risk of explosion and put hundreds of children and families within what's called an incineration zone, meaning that if an explosion were to ever occur, anyone in the surrounding zone would be immediately incinerated.

Furthermore, SoCalGas, the operator proposing this expansion is the same operator responsible for the 2015 Aliso Canyon disaster, the largest natural gas blowout in U.S. history. How

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1 can we trust that SoCalGas can responsibly manage and operate their facilities and prevent a
2 disaster like this from happening in our community?

3 The second thing I'm urging the Commission to do is to study alternative locations for this
4 compressor station that are located far away from homes, schools and businesses. I am also urging
5 the Commission to explore less polluting designs for this compressor station that rely on clean
6 energy and electric sources as opposed to fossil fuels.

7 Lastly, while I thank the Commission for moving forward with an in-person public meeting later
8 this month. I would like to ask that we be notified of this meeting at least 15 days in advance to
9 allow time to notify community members. Thank you.

10 **Grace Weeks:** Thank you for your comment.

11 **Brewster Birdsall:** Thank you Lyra.

12 **Grace Weeks:** All right, Haley Ehlers, I'm going to unmute you. Go ahead.

13 **Haley Ehlers CFROG:** Hello, my name is Haley Ehlers with Climate First: Replacing Oil and Gas. I live 3
14 quarters mile away from the Ventura Compressor Station. From my porch I can almost always hear
15 the deep rumbling noise of the site, and often the air in my neighborhood has an unusual chemical
16 odor. It's the type of smell that your body instinctively knows is unsafe and to head inside. I try my
17 best to protect myself from this pollution with air filters, and even planning the route of my jogs,
18 based on wind direction at the time and only walking until I feel safely far enough away, knowing
19 that running will make me breathe this pollution even deeper.

20 Now it is time for the State and your commission to help protect me and my neighbors too. The
21 EIR must be comprehensive and incorporate the experiences and priorities of our community, not
22 just what is deemed important by SoCalGas. We've heard many stories from parents who have
23 taken their children out of school at EP Foster Elementary, fearing public safety and air quality
24 concerns. How are you studying the potential impacts of a blast leaks or big blowdown events?
25 What about noise levels? This facility is in our lived environment and its impact is vast. This analysis
26 must be illustrated above that.

27 Of course it is in the best interest of the profiting company, SoCalGas, to limit the scope of the
28 review to avoid alternatives proposed by the community, but it should not be in the interest of the
29 Commission who is dedicated to advancing equity and environmental justice. The Commission must
30 prioritize studying alternative locations with less pollution. I'd also like to thank you for agreeing to
31 host an in-person meeting here in West Ventura where we're excited to see you, and you can hear
32 from even more community members. Thank you.

33 **Brewster Birdsall:** Thank you.

34 **Grace Weeks:** Thank you. All right. Next up is Jose Manuel. I am unmuting you.

35 **Jose Manuel:** Good afternoon, my name is Jose Manuel Rodriguez and I'm community organizer for
36 the cause of Entera, a nonprofit organization that aims to tackle social justice issues that revolve
37 around immigration rights, housing rights and environmental justice issues.

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1 This proposed expansion for the SoCalGas compressor is a classic environmental injustice
2 project aimed to further pollute our local area at the expense of our community. This gas
3 compressor has posed a great threat to our local youth due to its proximity to an elementary
4 school, causing several health related issues in our youth population that are attributed to the
5 presence of greenhouse gases being emitted to the atmosphere. In a study conducted by NASA,
6 they have identified around 550 geographical individual points in California that identified high
7 amounts of greenhouse gases, specifically methane to be actively released into the atmosphere.
8 Upon further inspection, it was found that 10 of these points are considered super emitters that
9 contribute to 1/3rd of California's methane output, and Ventura has been noted to be one of these
10 super emitters. This is a cause for concern. We, as Venturians, should not be subject to the high
11 amounts of gas emissions that prove to be affecting our health, most especially the health of our
12 children.

13 It does not make sense to further increase the production of emissions and neglect the serious
14 health impacts this compressor will bring if this expansion is given the green light. As a community,
15 we are actively trying to rectify the past years of environmental neglect at our expense from big
16 industrial corporations like SoCalGas, and are committed to advocate for more environmentally
17 sound alternatives that will alleviate the health issues we are actively facing due to our current
18 environment.

19 I thank the Commission for holding this virtual space for us to voice our concerns but I strongly
20 urge you to set up an in-person meeting space so you can hear from our people on what we are
21 currently dealing with, and how an expansion will further worsen our community. Thank you.

22 **Grace Weeks:** Thank you.

23 **Brewster Birdsall:** Thank you for that input.

24 **Grace Weeks:** Next up is Brooke.

25 **Brooke Balthaser:** Okay. Good evening, my name is Brooke Balthazer and I'm the community
26 organizing manager at CFROG or Climate First: Replacing Oil and Gas. I'd like to thank the
27 Commission for moving forward with an in-person meeting for this issue and ask that this meeting
28 be held at a time that is convenient for working families, and includes language accessibility to
29 assure that all residents can attend and participate. I would also like to ask that we're notified of
30 this meeting at least 15 days in advance, and that any and all material related to this meeting are
31 available in English and Spanish.

32 I would also like to strongly urge the Commission to study the significant public safety and air
33 quality concerns in the environmental impact report for this proposed expansion. There is a reason
34 why compressor stations are generally situated away from sensitive sites, and that is because of the
35 risk of explosion. SoCalGas is the same operator responsible for the 2015 Aliso Canyon disaster, and
36 cannot be trusted to responsibly operate this facility, let alone one that was doubled in size. This
37 proposed expansion would double the pollution that our community has to face each and every
38 day. In 2017, NASA identified this compressor station as a super emitter of methane, a pollutant
39 that has significant negative impacts on public health.

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1 Now, imagine you're a parent of a student attending EP Foster Elementary School. Would you
2 send your child to school every day, knowing that the facility next door was a super emitter of
3 methane, and at risk of exploding. If your answer is no, I have to wonder why the Commission is
4 okay with making this a reality for hundreds of families.

5 I would like to urge the Commission to prioritize studying alternative locations for this
6 compressor station with less polluting designs. Building new polluting equipment in this community
7 is an environmental justice harm and fails to uphold the CPUC's environmental and social justice
8 commitments. This is an opportunity to relocate the project out of a disadvantaged community and
9 remedy a legacy of pollution. Furthermore, the Commission should recognize that the oil and gas
10 industry is in decline, and we have an opportunity to manage this decline in a way that fosters a just
11 transition to protect frontline communities. Thank you.

12 **Grace Weeks:** Thank you.

13 **Brewster Birdsall:** Thank you.

14 **Grace Weeks:** Okay. Next up is Carrie. I'm going to unmute. Let me reset the timer, whenever you're
15 ready.

16 **Kari Aist:** Thank you. My name is Kari Aist and I am a part of the leadership circle of Showing Up for
17 Racial Justice in Ventura County, as well as a member of the Fierce Vulnerability Network which
18 began this Westside Clean Air Coalition way back when, in 2017 or 2018, when we first heard about
19 the huge release that was viewed by NASA from out in outer space, or wherever. And were very
20 alarmed with all that that super emitter stuff that was going on, on the Avenue where some of our
21 members lived. So I am actually at a school board meeting about a quarter mile from the
22 compressor station in question here and we're all rallying for another cause but really, what's going
23 on overall is that we're all concerned about supporting the needs of the people over the
24 requirement to make profits by the oil and gas industry in such a way as to harm everyone around.
25 It is just an absolute no brainer that we ought to be moving that compressor station away from
26 Foster Elementary right across the street. And if CPUC truly does stand for, you know, reducing
27 environmental harms and standing up for the people and all the other things, well, then, I think that
28 you ought to be pushing all you can to make this compressor station, well first of all, never be
29 expanded but also to be relocated somewhere where at least it's not going to be harming the
30 thousands of people that are in the vicinity, living and working and trying to go to school. If you've
31 ever been by this compressor station when gas is released, it's not good for your health. And the
32 kids are exposed to it almost every day. This is just not acceptable.

33 So I'm really glad that CPUC not only is having this chance for us to weigh in virtually, but also
34 gives, is giving us an opportunity to come together in person to make our statements and I want to
35 see CPUC also begin pushing as if your children were going to EP Foster, as if you were living in the
36 neighborhoods surrounding this compressor station. Make sure that we get that environmental
37 impact review and then squelch this forever, this need to expand the station, and instead push
38 amongst you as hard as possible to relocate somewhere else. We know it can be done, it has to be
39 done. It is essentially a very racist position to not be moving it. So I call on you to make that happen

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1 and I will definitely be there in person to continue to make my opinions known. Thank you for
2 letting me have my say tonight, appreciate it.

3 **Grace Weeks:** Thank you for your comment.

4 **Brewster Birdsall:** Thank you for coming out.

5 **Grace Weeks:** Except is Ron Whitehurst, going to allow you to unmute, whenever you're ready.

6 **Ron Whitehurst:** Hello, my name is Ron Whitehurst. I'm a member of the West Side Community
7 Council, and I'm chair of the Revite Committee and we're really proud of our neighborhood. The
8 West Side, the creative side of Ventura, and the compressor was placed in our neighborhood. When
9 the city fathers saw the poor brown people as disposable, and it was a red line community, and
10 there was all kinds of dirty industry put into the neighborhood. It's time for this to stop. It's time to
11 reverse that wrong.

12 The SoCalGas has proposed some different sites, one of them is actually closer to my house,
13 the Devil's Canyon site and though we need to have more options, and so-called dash, and not have
14 that it costs more money as a major consideration, how much is the value of a human life. How
15 much is the value of a child's health from being in the neighborhood where they are suffering from
16 asthma, from continual exposure to the gas, not just methane, but the B-tex materials, benzene,
17 methyl benzene, touine, and xylene that accompany the SoCal natural gas.

18 So we're working on decreasing our gas use, moving off of fossil fuels and so that should be
19 consideration, there should be planning for less natural gas, should be part of the considerations for
20 expanding this operation. The gas is going up to Montecito. We should maybe relocate this next to
21 Oprah Winfrey's house. I'm sure she would appreciate sacrificing her health for SoCalGas. Thank
22 you.

23 **Grace Weeks:** Thank you for your comments. Melissa, you are next let me allow you to unmute, and
24 whenever you're ready.

25 **Melissa Muñoz:** Good evening, Commissioners. My name is Melissa Munoz. I am a student at Oxnard
26 College, a fellow with Climate First: Replacing Oil and Gas or better known by our acronym as
27 CFROG, and a lifelong resident of Ventura County.

28 I remember vividly as this past October, while canvassing these friendly neighborhoods, seeing
29 kids play around, when suddenly there was the gas compressor station. I'd learned about it but I
30 was truly baffled to have seen it just a crosswalk away from EP Elementary School and the
31 surrounding homes.

32 As CFROG has visited the west side of Ventura to invite community members to informational
33 events, we had asked the community members about their living experience in dangerously close
34 proximity to the compressor station. I heard very similar complaints – occasional nosebleeds,
35 migraines too frequent, some people with asthma, children complaining of the horrible smell, loud
36 noises, and feelings of unsafety. No family or child should feel unsafe in their communities. No
37 family should be put in health's harm way, or put at risk if some leak or burst were to occur. The
38 residents of Ventura, but these neighborhoods in particular, deserve better and need to be heard
39 and protected. I would like to reference an alarming study by NASA in 2017, identifying this

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compressor station as a super emitter of methane. With all that being said, it's appreciated that the Commission has planned to host an in-person meeting community engagement meeting. I would like to ask that this meeting be held at a central location in West Ventura at a time that accommodates working families and includes language accessibility to ensure all community members can participate. Thank you.

Grace Weeks: Thank you, Melissa. Alright. Next is John Hankins. Let me unmute you, and whenever you're ready.

John Hankins: Mute. Thank you. Can you hear me?

Grace Weeks: Yes.

John Hankins: Alright. I'm going to take a slightly different tack. First of all, this is my own personal comments. I live on the west side of Sycamore Village and, man, isn't that really nice bike path great? They upgraded it. I am also a Sierra Club journalist. I'm a journalist all my life. I was here since the 1969 oil spill, not my fault, but myself and Bob Solon, and all that, we did all that stuff. And then there's Planes Pipeline, and then and then you know all this stuff that's going on in the oil industry, the open up a new pipeline, and this, that, and the other, and then you had really bad actors, Greca Oil Company and leaks and leaks. District attorneys went after them. So the take I want to impart is I've been covering the oil and gas industry since the sixties, mostly from Santa Barbara, but I moved here in 2000, and I got to say, I don't trust the oil and gas industry, and I know this as a journalist. Now my stories were always fair. In fact, the *Oil and Gas Journal* printed some of my stories, and so and I also have a family member who works in the industry. But please move it. You'll be a hero. And I understand the PUC will give, will let you raise your rates if you are in dire straits when you move.

Grace Weeks: Thank you for your comment, John.

Brewster Birdsall: Thank you.

Grace Weeks: Okay. Next is Jonathan Ullman. I'm gonna allow you to unmute.

Jonathan Ullman: Hi, my name is Jonathan Ullman. I'm the director of the Santa Barbara Ventura, Chapter of the Sierra Club. Our members and supporters live in the neighborhood. We are very concerned about this development. The fact is that when one of the reasons that we're here today is because of the very, very or if not any notice that was given about this project to begin with, so I hope that we have charted a new course, and that there is plenty of time for people to go to the public hearing in person. We have at least 2 weeks' notice but frankly, when I heard about this event, I was very surprised it was coming up so quickly. I was just, I've never seen that. I know it's scoping but it's still, it's very important that the community be aware.

You need to look at the impacts of gas explosions, gas on the school and the surrounding neighborhood, you need to look at the emissions that might occur in case of accidents, but also on a daily basis. You should also look at what happens upstream or downstream, rather, I guess, but up north in Golita, the Golita facility, the underground reservoir facility which sits underneath Santa Barbara Airport, the major public park, Bayfront Park, and UC Santa Barbara, because this will have impacts on that, and it will make that potentially more dangerous.

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Also, you should look at the climate. This will increase carbon, which is diametrically opposed to the policy of the State of California. And so this is definitely moving in the wrong direction. There are alternatives. You should move it, you should keep it the same size or remove the natural gas in that area. We have alternatives. We really don't need it. Thank you.

Grace Weeks: Thank you for your comment. As of now, we have no more hands raised. I do see that there's some people on the phone. So again, if you're calling in. Oh, one more comment. As I was saying, if you are on the phone and you want to raise your hand, dial *9, and then *6 to unmute yourself when asked if you're on the phone and I that hand went away. So go ahead and re-raise it if you wanted to make a comment.

Brewster Birdsall: Anyone on the line want to dial that *9 to raise your hand, this would be the good time. And seeing none. I would begin to close this meeting with the very clear caveat that the story is to be continued. Grace, how does that sound to you. Should we move to the next slide.

Grace Weeks: Sure.

Brewster Birdsall: All the folks who have been notified of this meeting via email or other means, as long as we have your email address, you will receive notification of the in-person meeting and the date and the time, and thank you everyone for your thoughtful comments here loud and clear, a couple of very clear themes here that are worth deeply exploring and in terms of advance notice as well for the next meeting and scheduling opportunity for families and folks who are working. And I know this time 6 to 7 pm is a busy time for folks with families so really appreciate your participation tonight. I do see one more hand coming online. And I think if we could unmute that, there's Molly McCoy available.

Grace Weeks: Go ahead.

Molly McCoy [parts inaudible – 0:55:50]: Good evening, my name is Molly McCoy. Thank you so much for hosting this meeting. I grew up in Ventura County, and when I was a senior in high school, I first learned about the equity issues with the gas compressor [...] and community advocate [...].

4 years later, as a graduating environmental policy senior from UC Davis, I felt deeply concerned, and I'm now quite familiar with the CEQA procedure and greatly worried about the submission, CEQA scope, and process. While air quality and noise levels are included in Appendix G, it is still worth noting that we are greatly worried about the impact from the compressors and want these areas of concern to be studied to the full extent as the CEQA procedure outlines and not merely exempted or waived off. With the alternative section, I implore the Commission to prioritize smaller electric and unpopulated sites over any other proposal.

Not only are we the community calling for environmentally just outcomes, but so is Senate Bill 350, the Clean Energy and Pollution Reduction Act 2015 which mandates the Commission improve air quality in disadvantaged communities and opt for renewable energy at their location sites. The gas compressor and surrounding community [...] has a [...] percentile of 83 and a pollution burden percentile of 87 which aligns with this bill definition. While CEQA doesn't have a universal environmental justice [...] chapters, I would like to direct the Commission's attention to the Bay Area Fair Quality Management Districts and [...] Justice chapter. The first of its kind and has been

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1 highlighted as a feature of CEQA's equity inclusion [...] equity agency, the CPUC can choose to adopt
2 these thresholds and prove that it's committed to equity by properly analyzing this project. With
3 this, CPUC can take initiative and lead California in the new ways of energy planning and bring
4 environmental justice to our [...] for once and for all.

5 How else do we meet California's climate and justice goals on time and make over [...]. If we
6 don't stop permanent projects like this, compressors and a low income margins like Ventura.

7 That, aside, I'm greatly appreciative of the Commission's decision to move forward with an in-
8 person community meeting. But I [...] amplify the calls for better community notice time and
9 accessible Spanish translations for meetings and community material. Thank you so much for your
10 time.

11 **Grace Weeks:** Thank you, Molly.

12 **Brewster Birdsall:** Thank you for that.

13 **Grace Weeks:** All right, and one more, Margo. I'm going to allow you to unmute.

14 Please state your name and let me get your timer going. Whenever you're ready.

15 **Margo Davis:** Hello, My name is Margo Davis. Are you able to hear me?

16 **Grace Weeks:** Yes.

17 **Brewster Birdsall:** Yes.

18 **Margo Davis:** Thank you very much. I live about a half a mile from the compressor station and I feel
19 strongly that it must be moved. There has to be an alternative where you put it somewhere else,
20 not near a residential area. Or if SoCalGas doesn't want to do that, it's probably because of the cost.
21 They just think it's cheaper to keep it here, that's all they can think about, which is not a very good
22 way to think. You're not thinking about what's important, that everybody else is raising here. So it
23 needs to be moved or it needs to be shut down. Thank you very much.

24 **Grace Weeks:** Thank you. Margo.

25 **Brewster Birdsall:** Well thank you everyone. I see no more hands. We had about 31 folks on the line
26 tonight, and I'm really happy that you were able to make it. As I mentioned before, I recognize that
27 6 pm can be an awkward time. I'm not quite sure what other times may be better but we will
28 certainly work on it and thank you for your participation and active involvement and thoughtful
29 comments.

30 As I mentioned many times, the Commission will send out another email blast with the in-
31 person meeting, date and time. The scoping comment period at this point is essentially extended to
32 a date to be determined. And with that, I think I will move to close our presentation tonight. Any
33 final calls?

34 Thank you everyone for being a part of this and we will look forward to meeting some of you
35 face to face in Ventura, probably within a month or so. Okay, have a good night and thanks for your
36 time.

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ZOOM CHAT CONVERSATIONS

Copy of: "meeting_saved_chat.txt"

18:57:14 From Brooke Balthaser to Hosts and panelists:

Tuesday evenings work for our community.

19:02:23 From Brooke Balthaser to Hosts and panelists:

Thank you.

19:02:26 From Miles Hogan to Hosts and panelists:

Thank you.

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From: Recording.transcript.vtt, edited for clarity.

Brewster Birdsall: Hello to the participants on Zoom. I hope you can hear me. We'll be beginning this presentation in a few minutes after we have some folks here in the room and we'll be taking public comments at the end of about a 20 min presentation. So we'll begin that presentation here in 3 or 4 min. Just give time for people to get settled and really, thank you.

Brewster Birdsall: Hello on Zoom. We are just about to begin the meeting here and I've made some housekeeping announcements to the room here in Ventura and thank you for participating. We see about 18 or 20 participants on Zoom and maybe about 30 or 40 here in the room.

For those of you in the room, if anyone needs a copy of the Notice of Preparation, we have hard copies available in Spanish and English. Just raise your hand and you may have a copy. For anyone who would like to be on the email list for future announcements, there is a sign in sheet right by the ramp and the table over there for email addresses. If you put your email down, then we will send you future announcements.

And I see one more hand for ... there we go. Okay, thank you. So we're handing out some paper copies of the notices here in the meeting.

I'll begin. Welcome to this scoping meeting for the Ventura Compressor Modernization Project. This meeting is being directed by the California Public Utilities Commission Staff. This is a public meeting for all people interested in the Ventura Compressor Modernization Project.

Today is April 15th 2025. We are holding this meeting in the Bell Arts Factory about one mile from the site. This meeting is also a virtual meeting on the Zoom platform.

Please note, this meeting is being recorded for use by the agency during the proceeding for the project and this presentation is available online at the project website today. We posted a copy of the presentation for you to view and download and copies of the Notice of Preparation are also available in Spanish and English at that same website. I want to note upfront this meeting is being held to ensure a robust public engagement and outreach.

We're happy to be here in Ventura, and I look forward to hearing from you. The scoping period will close on April 30th. I'll talk about this more later in the presentation. So going on to the slides here – the meeting guidelines. This is a presentation that will last about 20 minutes, maybe a little longer, and during this presentation participants on Zoom may write in the chat box and these will become part of the recording.

If you want to make a written comment on the project, please use the email address which is shown here, and it will be shown again and again. In the Zoom format, all the participants will be muted until the time for public comment at the end of the presentation. Here in the room, we will take public comments at the end of the presentation before hearing from the Zoom participants, so that the folks in the room have a chance to speak first.

Here's a quick rundown of the order of events for the scoping presentation. And, as I said, this should take about 20 min and a public comment period will follow some introductions.

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1 Who are we and who do we represent? I'll try to avoid using acronyms but some of the
2 abbreviations appear throughout the slides.

3 Now the scoping meeting is being directed by the staff at the Public Utilities Commission, the
4 California Public Utilities Commission. John Forsyth is the CPUC project manager, and Michelle
5 Wilson is here as the program supervisor for the California Public Utilities Commission. The
6 California Public Utilities Commission is the State Regulator responsible for safe and reliable utility
7 service at reasonable rates and for this project, the utility that is under review is the natural gas
8 provider, Southern California Gas Company, otherwise known as the applicant.

9 My name is Brewster Birdsall and I am from Aspen Environmental Group and the CPUC hired
10 Aspen to prepare an environmental review that is compliant with the California Environmental
11 Quality Act known as CEQA. Grace Weeks is here from Aspen helping to facilitate and Aspen
12 Environmental Group will prepare this environmental impact report (or EIR) for the CPUC to use in
13 reviewing the project that is proposed by the applicant. SoCalGas is the applicant seeking CPUC
14 approval to construct and operate the Ventura Compressor Modernization. The formal application
15 was filed in August 2023. Over the subsequent year, supplemental information came to the Public
16 Utilities Commission and made the application complete. It was determined in late 2024, October
17 31st of 2024.

18 Now the purpose of this meeting is to give you information on the process that the CPUC must
19 follow in developing the environmental impact report. The scoping process allows us to hear your
20 ideas on the scope and the content of the environmental review, and for us to hear your issues of
21 concern.

22 Scoping meetings are required for projects that are statewide and regional significance as this
23 one is. Later we'll give you direction on how to file your comments on the scope and content of the
24 environmental impact report that we're preparing. Your comments can help the CPUC identify the
25 environmental effects and ways to mitigate environmental effects, including possible alternatives to
26 the project.

27 This is a chart of the basic application process. The applicant must follow certain steps before
28 the CPUC will decide to approve the new infrastructure. The environmental impact report will be
29 one of many considerations within the discretionary decision of approving or disapproving the new
30 infrastructure.

31 Now our goal in preparing the environmental impact report is to provide a written analysis that
32 is compliant with the requirements of the California Environmental Quality Act and the spirit of
33 CEQA centers on disclosure. Our audience is you – the public and the agency decision makers. The
34 environmental impact report will provide information on the possible environmental damage and
35 how to avoid it. The law requires us to focus on how the project may cause an indirect or direct
36 physical change in the environment. So you'll hear us talk about this physical impacts to the
37 environment.

38 The overall process of preparing an environmental impact report follows certain predictable
39 steps that can take a year or more to fully complete and scoping is one of the early steps. The input

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1 we receive here will help to shape the content of the environmental impact report. After the draft
2 environmental impact report becomes available, another round of public review and comment will
3 occur, followed by a final environmental impact report, and then a movement towards certifying
4 the document as complete or compliant with the California Environmental Quality Act.

5 So this slide shows the basic content of the project description that must appear in the
6 environmental impact report. Our analysis of impacts will focus on these activities, including the
7 long-term maintenance and use of the facility over the life of the project. We'll describe how these
8 activities may cause physical changes in the environment.

9 Onto some specifics about the project – the site of the project is an existing natural gas
10 compressor station and although it is zoned as industrial, the site itself is adjacent to sensitive land
11 uses, including residences in the EP Foster Elementary School.

12 The California Public Utilities Commission has an adopted environmental and social justice
13 plan. The project site is located in a disadvantaged community which is a designation defined by the
14 California Environmental Protection Agency. When making its decision on the project, the
15 CPUC will consider whether the project is consistent with the goals of the CPUC's Environmental and
16 Social Justice Action Plan as adopted by the Commission in 2022, before this application was filed
17 and found complete.

18 Although environmental justice is not a topic in the consideration of environmental effects
19 under CEQA, the EIR will disclose the CPUC procedures for consideration of environmental and
20 social justice in the overall decision-making process.

21 This slide summarizes the different equipment that SoCalGas proposes to construct and
22 operate at the site, and the project overall entails the modernization of the Ventura Compressor
23 Station. In summary, SoCalGas would upgrade the compressor station to modernize and improve
24 the reliability of this portion of California's natural gas transmission system, which extends from the
25 Ventura Compressor Station through Santa Barbara and Goleta, and to the north as far as
26 communities around San Luis Obispo and Paso Robles.

27 The project would replace 3 aging natural gas driven compressors with a new hybrid
28 configuration composed of 2 electric and 2 natural gas driven compressors. SoCalGas articulates
29 that the purpose and need for their project within the application, which is available at the CPUC
30 website.

31 I'll show some slides showing ground level views around the existing site. And for those of us
32 here in Ventura, I'm sure some of these pictures will feel familiar.

33 First, this is a view along North Olive Street, adjacent to the site. With the project, new
34 structures would become visible. The project would retain the fence along North Olive Street.
35 Moving a little bit further, the project would also retain the fence and the perimeter fence would
36 remain the same, and this is at the intersection of West McFarlane Drive.

37 Moving quickly. Excuse me back one. This is more of an angled view into the site from again
38 North Olive Street, but facing more to the southwest.

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1 And this photo shows the tan, it's yellowish tan, blowdown stack that is partially obscured by
2 the fence to the right of the center. And the project would have taller blowdown stack.

3 This is a photo from Ventura River trail, facing to the east. The exhaust stacks for the 3
4 compressor engines appear just over this chain link fence on the left. That's a more distant view.
5 And the view from Grant Park Ridgeline Trail with the site in the more of a middle ground.

6 This slide shows a conceptual site plan proposed by the applicant and the project would add
7 larger structures along the western edge of the site, primarily the compressor building, a new
8 blowdown stack is more in the center of the site and the project would remove the existing
9 compressor building from the northern edge, in that empty spot up there.

10 Okay, next up some details on the content of the environmental impact report that we will be
11 preparing. These are the various chapters that will appear in the environmental impact report.
12 We're planning to include Public Safety within the Hazards and Hazardous Materials topic.

13 Now, each of the chapters in the environmental impact report would follow this outline,
14 beginning with a description of the environmental setting, regulatory setting as well, and then a
15 threshold of significance for each environmental impact and a conclusion with mitigation necessary
16 to avoid impacts and also an evaluation of cumulative impacts and the impacts of alternatives to the
17 project.

18 A little bit more about alternatives - alternatives are an important consideration. The scope of
19 the environmental impact report must include a range of alternatives. The range of alternatives,
20 however, is limited to those that meet most of the basic project objectives and these project
21 objectives are specifically articulated by the project applicant. So I'll spend a moment talking about
22 those project objectives.

23 There are 2 slides of project objectives that have been articulated by SoCalGas and the CPUC
24 must keep these objectives in mind when reviewing possible alternatives to the project. As I
25 mentioned, earlier alternatives to the project must meet most of the basic project objectives. On
26 this 1st slide you may notice that SoCalGas emphasizes reliably serving this north coastal portion of
27 their system and this includes moving natural gas into the La Colita underground storage fields.

28 Here's the second slide of project objectives. This shows that the company has an interest in
29 reducing the levels of air pollutant emissions from the facility and in completing the modernization
30 in a timely manner.

31 The CPUC will actively explore and compare alternatives within the environmental impact report.
32 The reasonable range of alternatives could include alternative technologies and even a complete
33 relocation of the facility to an alternative site. The environmental impact report must also include
34 analysis of the no project alternative and that has to describe what could reasonably be expected to
35 occur in the foreseeable future if the project is not approved.

36 This concludes the short, scoping presentation. We will present the sequence of next steps
37 here after scoping and we will move to public comments here in a moment.

38 As noted upfront, the CPUC is accepting scoping comments right now and future events and
39 milestones will be announced via email and also posted on the CPUC's website for this project. The

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1 project website includes a link to download the Notice of Preparation which was released on
2 February 28th. The Notice of Preparation is available in Spanish on the website, and the close of
3 scoping is 2 weeks from now, April 30th. Of course, we encourage you to email your scoping
4 comments anytime earlier rather than later. Scoping comments may be mailed or really email is
5 probably the best to this address here – vcm_ceqa@aspeneg.com.

6 When you submit scoping comments, you should include your name, your organization, if any,
7 and your mailing address, email address for future notifications. Public comments will become part
8 of the public record and will be published in a scoping report at the time of the draft environmental
9 impact report.

10 Thank you for your attention and we will now provide some time for public comments.

11 Because this meeting is being held on Zoom, the microphone is here for those participants on
12 Zoom to hear you. You may have to come and speak into this microphone. If you would like to
13 speak to the room, feel free to speak and we will call on you. Let's decide how to go through that in
14 an orderly fashion.

15 In general, we would like the comments to be concise and to stay on topic. Ideally respect
16 others opinions. The comments will be recorded as long as they are spoken into the microphone on
17 this computer here. And, as I said, written comments are encouraged.

18 I think, in the room here, what we should probably do is just simply raise hands and maybe,
19 Grace, you can give me a sense – are there many hands raised on Zoom?

20 **Grace Weeks:** On Zoom so far, 2 on Zoom so far.

21 **Brewster:** Folks will be raising their hands on Zoom while we go around the room here. 1st up, I've
22 met Miles. If you'd like to stand right there and speak any staff.

23 **Miles Hogan:** Thank you. Okay. alright. Good evening, everybody. My name is Miles. I'm a senior
24 assistant city attorney with the City of Ventura. I just want to let everybody know the City of
25 Ventura will be submitting written comments by the deadline of April 30th and we encourage
26 everybody in the community, if you want to submit comments, as was mentioned, you can share
27 them tonight but we also encourage you to submit them in writing by that April 30th deadline.
28 Thank you. Oh, and thank you for doing an in person meeting. We hope, when there's future
29 meetings like this that you again do them in the community as well. Thank you.

30 **Brewster:** Absolutely. You're welcome. Thank you. **[inaudible - 00:32:52]** Yes. A question in the room
31 is, will comments be accepted in Spanish written? And the answer is yes, we will keep our
32 translators at the ready to interpret comments written in Spanish. Thank you.

33 **[inaudible - 00:33:16]**

34 **Casey Rodriguez:** Hello! I am Ventura, Art and Culture Commissioner Casey Rodriguez. The
35 environmental social justice plan lockstep, a land acknowledgement, and a moment for a Shumash
36 person whose unceded land this compressor sits on should have opened this meeting. I have
37 personally been actively opposing this compressor since day one. Because it is my birth obligation
38 and responsibility as a Shumash woman to not only care for my ancestral homeland, but safeguard

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all lives that currently live here, for we are all connected. Thank you for all who have done years of work protecting west side citizens and all who work and visit here. As for cultural resources, it is crucial to reach out to Shumash elder Julie Stinsley. Please reach out to Ventura councilwoman Liz Campos for her contact information. Thank you.

Brewster: Thank you for that comment.

Haley Ehlers: Hello, my name is Haley Ehlers with Climate First: Replacing Oil and Gas, or CFROG. I live 3 quarter miles away from the Ventura Compressor Station. From my porch I can almost always hear the deep rumbling noise of the site, and often the air in my neighborhood has an unusual chemical odor. It's the type of smell that your body instinctively knows is unsafe, and to head inside. I try my best to protect myself from this pollution with air filters, and even planning the route of my jogs based on wind direction at the time, and only walking until I feel safely far enough away, knowing that running could make me breathe this pollution even deeper.

Now it's time for the State and your commission to help protect me and my neighbors too. The EIR must be comprehensive and incorporate the experiences and priorities of our community, not just what is deemed important by SoCalGas. We have heard many stories from parents who have taken their children out of EP Foster Elementary fearing public safety and air quality concerns. How are you studying the potential impacts of a blast, leaks or big blowdown events? What about noise levels? This facility is in our lived environment and its impact is vast. This analysis must be illustrative of that.

Of course, it's in the best interest of the profiting company, SoCalGas to limit the scope of the CEQA review to avoid the alternative proposed by the community. But it should not be in the interest of the Commission who is dedicated to advancing equity and environmental justice. The Commission must prioritize studying alternative locations with less pollution.

We'd like to thank you for holding this in person meeting here in West Ventura. We hope you were able to enjoy our neighborhood, and even visit the site to experience for yourself firsthand the smell, noise, and danger that it creates in contrast to the vibrant, diverse, and resilient community and nearby school that surrounds it. Thank you.

Brewster: Thank you. I see the 1st hand I see, and then a second. Would you like to come up? Or ...

Grace: It's just the computer. Do you want me to scoot it forward?

[inaudible - 00:37:26.830]

Professor: Hi, I'm a retired human anatomy [inaudible] professor. At present I'm the last of the citizens. I'm a disabled law abiding citizen. I see that for whatever reason, out of a 102,000, the minimum inhabitants of this community, there's less than a hundred people that is now representative of what's going on in our communities. Not touching the external events and recommending everyone, we can only act within the rule of law, nonviolent, peaceful within the Constitution. At present, our country is facing economic warfare, words, etc, etc. and our human capital are the children. Those children's are very important to us.

One thing I observed, the presentation, for whatever reason is lacking, it's lacking statistics about the consequences that about over 40 years SoCal has cost, and the health and the well-being,

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1 the lives of community people. Among the community, people have mine dying of cancer that lived
2 here. I see friends of mine struggling with cancer for the 2nd, 3rd time, live here. Even myself, I'm
3 still struggling with many tests to see how much this cancers are affecting me and my health. So
4 there is no statistic data analysis here.

5 I don't know how the CPUC is going to do these determinations and the misguided majority
6 recommendations for SoCal to stay here. It's a disservice to quality and the life and the lives of
7 American citizens. I have experienced, as many have experienced, nose bleedings, I have
8 experiences sore throats. Oh, struggling with breathing! Even my organs are getting adversely
9 affected.

10 I live near the compressor. What I would like in this CPUC report is this, please include 45 years
11 of data of the health condition of students that have attended the school and live in this
12 neighborhood – how their health has been affected and how they're struggling with the illnesses and
13 see the correlation that might exist between the gases emitted by SoCal, this compressor and the
14 people living here in this community, how that correlates over time, over 45 years, the last 45 years.
15 That should give us a scientific lead where we are at and how adversely it's impacting the
16 community.

17 [00:42:16] It's very important because I've seen kids, they [inaudible] their by the time they're
18 on the 3rd grade, they cannot run. They suffer asthma, other illnesses, and some of them, as I
19 understand, suffer of cancer and no one's keeping statistics, no one's using methodology of
20 statistics, the consequences that are due to this compressor.

21 It's very important that it be included in these statistics, and that the, that mitigation, you
22 cannot mitigate cancer. You cannot mitigate death, so alternative clean energies we will be very
23 happy for SoCal to sell us wind energy, solar energy, etc. etc. Buy from them, do good business with
24 them. But to continue doing this deadly business, it's adverse to our community and it's a nation
25 problem. It's a national problem. I see, I can tell you I have no use for the Chinese but the Chinese
26 have clean energy. So please, I would like this environmental impact report to include alternative
27 clean energy, like electric cars, etc. etc. And please get a statistic from the hospitals, the schools, the
28 records about the parents, health, the children's health, etc. Thank you.

29 **Woman 1:** Thank you. Just want to give everyone a chance to comment. Go ahead.

30 **Woman 2:** Alright. Maybe we should form a line. We have a lot of hands. But okay,

31 **Brewster:** This hand would be next. Thank you.

32 [inaudible - 00:44:40.780]

33 **??:** Sangrado la Nariz (Bleeding from the nose.)

34 **Translator:** I have 25 years living in western tourist. I have 4 kids, and lately we've been having a lot of
35 health problems. I've been taking them to the clinic because blood, their nose bleeds and they say is
36 dryness from the weather. I had pneumonia and asthma. I want to invite you to reflect on all these
37 things, and I agree with the gentleman that the kids, especially they are the future, and we have to
38 keep them in mind. Thank you.

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1 **Brewster:** Thank you.

2 **??:** Is there a microphone?

3 **Brewster:** You just speak into that.

4 **??:** Anyone who has an interpreter gets one, k?

5 **Brewster:** Excuse me?

6 **??:** Interpreters get long term.

7 **[inaudible - 00:46:13.670]**

8 **Kari Aist:** Hi, my name is Kari Aist. I am a representative of the Leadership Circle for Showing Up for
9 Racial Justice among other groups, Fierce Vulnerability Network is another group I'm active with and
10 I think the most important thing to always keep in mind is that though this compressor station was
11 here early, people were allowed to live around it, and the school was allowed to be built across
12 from it before we really understood the impacts. But now we know. And now we know it's
13 environmental injustice to do anything other than move this station.

14 No, any, nothing else will do justice to the people who are marginalized in this community who
15 are hit by not just the impacts of this, but so many other impacts. I stand against pesticide use in the
16 area, that accumulates in bodies in addition to the harms that are sent forth by the air quality
17 impacts and by everything else that happens. So we can't just look at this one thing. What we need
18 to look at is this impacts people in marginalized communities who have never historically been
19 allowed to really live anywhere else by the system. They have no voice, no power. And so they're
20 stuck here absorbing the impacts. But we can stand for them. We can stand against anything other
21 than moving this ridiculous station to an area where, at the very least, if it blows up, it's not going to
22 harm as many people. And it's regular leaks. It's regular air quality impacts, everything else that it
23 does can no longer hurt everyone, including those kids at that school. And they don't have
24 anywhere else they can go, you know, or they're being pulled out. But they need to be educated in
25 health and not coming out of, you know so many grades there with asthma and all **[inaudible]**. So
26 do the right thing. There's no question that CPUC should do nothing but the right thing and move
27 the station.

28 **[inaudible - 00:48:32]**

29 **Brewster:** Thank you.

30 **[inaudible]**

31 **Brewster:** Speaking in the general laptop area.

32 **Woman 3:** ... Everybody can hear me. I'd like to encourage everybody who comes here to use their
33 theater voice and talk to the very back person in the room back there, even if you feel weird when
34 you do it. And I went to a workshop this last weekend about environmental justice. And there I
35 promised myself that I was going to start writing stuff. So I wrote some stuff about this meeting
36 today. It's far too long. I will not read it all, but I will tell you I'm going to read the last part, and the
37 title is, who knew it was the best that we could do, and when we 1st started out burning coal in
38 caves, we didn't know it was going to give people tuberculosis. It took hundreds of years and we

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1 didn't know that the plague was caused by a virus. We did the best we could and with the energy of
2 the sun that's trapped in these remains from the Cretaceous, we have worked miracles as humans.
3 And now we're reaping the whirlwind. In the 19th century, everything that we could do with oil and
4 gas was intoxicating in the 19th century. Who knew it was the best that we could do. But now we
5 know, we know all the ways the waste from our 19th century energy sources are harming our
6 world, our children, our health, our soil, our air and water.

7 We know that many new, non-polluting energy sources exist and are successful in use around
8 the world. I'm going to rework that sentence, and still there are those of us who want to believe
9 that extracting oil and gas is the best we can do. Come on, be **[inaudible - 00:50:51]** step into a
10 clean energy future. Of course it will not be smooth and easy. It will require our full intelligence and
11 creativity. Shutting down energy from the remains of the past and using the energy all around us,
12 and the air and the water and solar, and who knows what more we will find, will be the great work
13 of the coming generations. Dedicate your courage and creativity for the future. Take one little step
14 forward, shut down this old gas compressor station, make the area safer for the school children,
15 their families, and our future.

16 **Brewster:** Thank you. More hands for next.

17 **Brooke Balthaser:** Good evening, my name is Brooke Balthaser and I'm the community organizing
18 manager at CFROG. I'd like to thank you for hosting this hybrid community scoping meeting as the
19 value of allowing our community to share their feedback and priorities regarding this issue cannot
20 be overstated.

21 I would also like to strongly urge the Commission to study the significant public safety and air
22 quality concerns in the environmental impact report for this proposed expansion. There are reasons
23 why compressor stations are generally situated away from sensitive sites, and that is the risk of
24 explosion and exposure to pollution. SoCalGas is the same operator responsible for the 2015 Aliso
25 Canyon disaster and cannot be trusted to responsibly operate this facility, let alone one that was
26 doubled in size.

27 This proposed expansion would double the pollution that our community has to face each and
28 every day. In 2017, NASA identified this compressor station as a super emitter of methane, a
29 pollutant that has significant negative impacts on public health. Now, imagine you're a parent of a
30 student attending EP Foster Elementary School. Would you send your child to school every day,
31 knowing that the facility next door was a super emitter of methane, and at risk of exploding? If your
32 answer is no, I have to wonder why the Commission is okay with making this a reality for hundreds
33 of families.

34 I would also like to urge the Commission to prioritize studying alternative locations for this
35 compressor station with less polluting designs. Building new polluting equipment in this community
36 is an environmental justice harm and fails to uphold the CPUC's environmental and social justice
37 commitments. This is an opportunity to relocate the project out of a disadvantaged community and
38 remedy a legacy of pollution. Furthermore, the Commission should recognize that the oil and gas

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1 industry is in decline, and we have an opportunity to manage this decline in a way that fosters a just
2 transition to clean energy sources and protects jobs and frontline communities. Thank you.

3 **Brewster:** Thank you. Let's see [inaudible - 00:53:38] that's good.

4 **[Speaker?]:** I would ask the environmental group to consider what most of us know [inaudible] gas
5 compressors. Between 2018 and 2020, the Jet Propulsion Lab did flyovers all over the State of
6 California and our gas compressor was considered in the top, I believe, 10 or 12 super emitters
7 leaking methane, not just in their station, but all over the school ground and the neighborhood
8 through pipes. In 2010, in Northern California, a gas pipeline, not a compressor exploded, taking out
9 3 or 4 blocks in a neighborhood, and it was there that a fire captain coined the phrase, Incineration
10 Zone. A lot of us have known for years we live in an Incineration Zone. I lived for 20 years less than a
11 quarter of a mile from this gas compressor station, and before running for city council was
12 diagnosed with Stage 4 lung cancer. That insult, I believe, was from all the emissions over years.

13 There's also left out of what you showed in your map, but which is right behind the
14 compressor, on the other side of Olive at Riverside Drive, is a housing authority project with at least
15 350 families. I'm not sure the total number of children there. What really hit home for me on this
16 project actually wasn't when we started asking the gas company to move 5 years ago, it was about 5
17 months ago I was at a meeting at EP Foster Elementary School in the daytime. And one of the
18 parents that was there for that meeting came in in tears, and she said, I'm sorry I can't and I asked
19 her if I could do anything, and she told me that her 10 year old son had just been diagnosed with
20 leukemia. And this is a chronic problem at that school, all kinds of cancers but asthma, quick after
21 they enter the school – healthy central nervous system problems, chronic nosebleeds, visual
22 disturbances, all suddenly, after they begin attending school. And I think it's very important that
23 that be included in the environmental report.

24 I also believe that, I've looked a lot I can't guarantee I'm right, but I believe there is no gas
25 compressor in the country that sits 70 yards from an elementary school front door. I don't believe
26 there's another gas compressor in the country that sits less than a mile or a mile and a half from
27 where humans live and work. Those things I hope you will take very seriously in your environmental
28 review. Thank you.

29 **Brewster:** Thank you. Do you sure had your hand up, did you? Yes, we're and then at least ... then with
30 one more of a flat pass, maybe.

31 **??:** Okay, yeah, thank you.

32 **Grace:** Whenever you're ready.

33 **Tim Nastiger:** Hi, everyone, my name is Tim Nastiger. I've been working with the Westside Clean Air
34 Coalition for 4 years, over 4 years. We started our work together, and I live about a couple of blocks
35 from the compressor over here on Simpson. I think one of the things I want to talk about is how in
36 considering the public safety concerns that a number of folks have already raised, one of the reasons
37 that we in the neighborhood don't trust SoCalGas is because of how they went about this project in
38 the first place. We really found, as a number of people have mentioned, most of us found out about
39 this from looking at the NASA Flyover that show this massive, these massive leaks coming out of here

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1 and, as I understand it, SoCalGas didn't really do anything about it until NASA published those
2 results. After we started working on this issue in July of 2021, they had a massive, unplanned,
3 unplanned venting that a lot of people in the neighborhood – they didn't tell the fire department so
4 the only reason the fire department found out about it was because people are complaining in the
5 neighborhood, and they consistently try to downplay these impacts on our community. And so we're
6 really depending on the CPUC in this process to visibilize these issues and to hold SoCalGas
7 accountable for like – a lot of us still don't understand, like where all the pipes going, that that in
8 these on planned events, just dump gas into the neighborhood.

9 So we need to understand those things and to get, and ultimately, we need to get this out of
10 the neighborhood. So it's very important to consider the alternate sites. I was glad to see the map in
11 the documentation that you shared outlining those 3 sites. I think I really hope that this EIR includes
12 all of those sites. Thank you.

13 **Brewster:** Black mask had your hand up in the background right? And then maybe scanning. Thank
14 you.

15 **James Merrill:** Good evening in Zoom land. My name is James Merrill, and while I currently serve as
16 the president of the Ocean View Elementary School District, I am here speaking, not for my board,
17 but as a private citizen. Ocean View, where we live is down in South Oxnard, a marginalized
18 community of lower incomes and mostly people of color. I'm having a sense of déjà vu. In 2007, our
19 community rose up to speak out against the proposed development of a liquefied natural gas
20 pipeline that would run right past our neighborhoods, endangering neighbors and children and
21 potential school sites because they couldn't build a school site there now, if the gas line were that
22 close. So I'd like to just reinforce all the concerns that have been expressed by my neighbors up here
23 in Ventura, and also reinforce the idea that we really need to start weaning ourselves from an
24 extractive culture anyway. So while relocating is a great idea, not even doing, you know, not even
25 building infrastructure for a long future of continued use of petroleum products is a better idea.
26 And there have been a lot of concerns about the current status of this thing, and there might be an
27 argument from SoCalGas this will be the new and improved facility that doesn't have all those
28 negative effects. To quote one of my favorite songs, accidents never happen in a perfect world. This
29 is not a perfect world, so good luck to all of you. Thank you.

30 **Brewster:** Standing as planned and then next to [inaudible - 01:01:24] and we will probably get those
31 because [inaudible]. Thank you, thanks for being, patient [inaudible]

32 **Grace:** Whenever you're ready.

33 **Kristian Nunez:** Hi, everyone, I'm Kristian Nunez, I'm a policy advocate with CAUSE. This is Central
34 Coast Alliance United for Sustainable Economy. We are a social organization who works with
35 communities in Ventura and Santa Barbara counties with community members who are impacted
36 by polluting industries. I'm also a lifelong resident here of West Ventura. I lived here all my life and
37 live about 2 blocks away from the gas revisitation.

38 So today I'm here to urge that the environmental review process for this proposed expansion is
39 centered around those experiences and the health of our community. Part of my work as an

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1 advocate and as working with someone that's concerned residents here in West Ventura, you know,
2 I've been connecting with people on this project for years, most who have no idea that they live
3 near this [inaudible - 01:02:26], let alone the dangers it possesses to their health and the local
4 environment. And as someone who has lived here my entire life, I'm just super concerned about the
5 public safety risks, the long term health effects and the lack of transparency surrounding this
6 proposal.

7 So over the years, parents whose children attend nearby schools have reported higher rates of
8 respiratory issues like asthma along with reoccurring nosebleeds and just serious conditions that
9 raise red flags. So the question, I think, remains right, is, what does it mean for a child's future,
10 when their lungs are exposed to methane and toxic pollutants day after day during the most
11 important years of development and growth. The health risks to our community cannot be
12 dismissed, and, unlike most compressor stations in the nation, the Ventura facility is located
13 alarmingly close to sensitive areas in West Ventura. According to SoCalGas, only 3 of their tent
14 compressor stations located throughout California are within a quarter mile of homes, schools, or
15 parks, and the one here in Ventura is the only one situated directly across the street from an
16 elementary. The other 2 about a thousand feet away, the 3rd are around 6,000 feet away, which is
17 still way too close.

18 And, as I pointed out, you know, this site rates within the 99th percentile nationwide for the
19 number of people living near fishing. And so with, you know this in mind, you know, we shouldn't
20 treat West Ventura as just an industrial zone. It's a neighborhood filled with homes, schools, you
21 know, residents who have local businesses, culture, exactly. You know, to not only place community
22 members at harm to an expansion like this it would just be unacceptable. And so it is essential that
23 the environmental review for this project include a full and honest analysis of the public health
24 impacts, and that it explores realist narratives that put our community's well-being first.

25 So this could mean seriously considering cleaner and safer solutions which could be in
26 electrification, reducing the scale of operations at a site and, as mentioned before, relocating this
27 facility entirely to one of the alternatives that SoCalGas itself has already identified as possible
28 solutions. This community is not a sacrifice zone. Our neighborhood deserves bold actions that
29 protect our health and not deepen our harm. We are calling for solutions that respect our lives, our
30 safety, and our right to clean air where we live, work and raise our families. Thank you.

31 **Brewster:** Thank you. Yes, and then we'll spread. [inaudible - 01:04:55]

32 **Child 1:** This is me and Leo and we lived close to this place that is gonna blow up. And we want to stay
33 safe. And we want our chicks to stay safe because they're really cute and we really love them.

34 [inaudible]

35 **Child 2:** Where AP Foster lives, it's close where my old school was, and one of the kids there, they went
36 to my old school. And also it's close to my school now so it can like kill animals because the air it
37 getting more blacker because there's smoke and it kill the animals.

38 **Brewster:** Good job, miss. Thank you.

39 [inaudible]

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Melissa Muñoz: [inaudible] Melissa Muñoz and I work on the environmental impact team at Patagonia, the Outdoor Clothing Company, based in Ventura. We employ more than 750 people at our headquarters here in town, which is located just a mile and a half away from the SoCalGas Ventura Compressor Station. Patagonia has been based in Ventura for the past 50 years. We are deeply committed to this community and to the health and safety of our employees and their families, including their children that attend our on-site child development centers.

We do not want this compressor station in our community and neither does the community. To assess and minimize the community health and environmental risks of expanding this facility, Patagonia urges the CPUC to conduct a complete environmental impact review. The EIR should include studying public health and safety impacts. As you are aware, and many people have said today, the compressor station is located in the middle of a densely populated urban neighborhood, and right across the street from EP Foster Elementary School.

Given the risk of explosion and lack of buffer zone, we are very concerned about the health and safety threats of children and nearby residents. It is also critical that the EIR study air quality and greenhouse gas emission impacts of this project. As folks have mentioned, NASA has already identified the Ventura Compressor Station as a super emitter of methane, and the site has a history of leaks and contamination that lead to nosebleeds, headaches, and evacuation from children and nearby residents. We are very concerned that expanding this compressor station will mean even greater threats to clean air for EP Foster students and the neighboring community for the next 50 years.

Second, Patagonia urges the Commission to prioritize studying alternative locations for the compressor station with less polluting designs. To be clear, Patagonia does not want this compressor station anywhere in our community, but given the location of the compressor station in an urban environment and near an elementary school, expanding the operation of this particular site is a [inaudible - 01:08:31]. Rather than expand this facility, we believe SoCalGas should consider moving the compressor station to an alternative site far from homes and children.

In addition to exploring alternative sites, the Commission needs to study fully electric and smaller compressors that contribute less pollution and pose fewer risks to communities. By allowing more polluting equipment to be built in this community, the Commission is allowing a shameful legacy of environmental injustices to continue. On behalf of Patagonia, and in solidarity with the Westside residents of Ventura, I urge you to consider this an opportunity to remedy a legacy of pollution on the West Side, and seriously evaluate relocating the project out of an already overburdened community. Thank you.

Brewster: Thank you. Do we have many more in the room? There are about maybe 4 or 5 hands up on Zoom also. I see 1, 2, 3, 4 right here in front. So we'll work through these next and then go to Zoom I think.

Julie: I'm Julie on the east side of Ventura. When I first moved here a few years ago, one of the first things I learned was that there was this gas compressor station in the middle of a overburdened community, and the absurdity of it was, it's just appalling. It's appalling and absurd that SoCalGas

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1 would even consider expanding it. The audacity to have that sort of entitlement in the midst of a
2 neighborhood that is struggling on so many levels – it takes a certain sort of heartlessness to do
3 that, and I'm so glad that you've heard from so many people who have been able to talk about their
4 personal experience living near the compressor station.

5 I don't know what more evidence you would need to make a decision to protect the health of
6 this community. We have lived with sacrifice neighborhoods for decades, centuries. We have
7 devalued the value of people's lives and just brushed it off as the cost of doing business. I don't
8 know where humans get off thinking that that's okay. So I certainly hope that this impact on the
9 community gets full consideration because we have to do better as a society. We all matter.

10 **Brewster:** Thank you. [inaudible - 01:11:17]

11 **Melissa Munoz:** Good evening, my name is Melissa Munoz. I am a fellow with Climate 1st Replacing Oil
12 and Gas known as CFROG, and a lifelong resident of Ventura County. Through my work with CFROG
13 and ties to this community, I've had the opportunity and pleasure to meet community members and
14 residents living along the avenue who are most directly affected by this gas compressor station. I
15 vividly remember my first time canvassing these friendly neighborhoods, seeing kids play around,
16 when suddenly there was the gas compressor station. I'd learned about it, but I was truly baffled to
17 have seen it just a crosswalk away from EP Elementary School.

18 CFROG has visited the west side of Ventura to invite community members to informational
19 events and such. While meeting people in the area, we asked residents about their living
20 experiences and dangerous proximity to the compressor station. I heard very similar complaints –
21 nosebleeds, migraines – far too frequent, several people with asthma, children complaining of the
22 horrible smell, loud noises, and most of all feelings of unsafety.

23 I, too, experienced a very strange reaction to the unhealthy air quality with what felt like
24 allergies flaring, but very fast and very unpleasant. It almost felt difficult to breathe. It made me
25 really angry for all the nearby communities forced to put up with this environmental injustice. No
26 family should be put in harm's way or put at risk if some leak or blast were to occur.

27 I would again like to reference an alarming study conducted by NASA in 2017, identifying this
28 compressor in the backyard of many as a super emitter of methane. I would like to urge the
29 Commission to prioritize and keep in mind that the well-being of the people of Ventura lies in their
30 hands, and therefore a thorough study of an alternative location for this compressor station must
31 be done with plans for a significantly less polluting modern design or not at all, keeping in mind the
32 proposed site stands in the 99th percentile for communities near compressor stations in the entire
33 U.S. which includes schools, daycares and community spaces. The residents of Ventura, these
34 neighborhoods in particular, deserve better and need to be protected and heard. Thank you.

35 **Brewster:** Thank you.

36 **[Man]:** Can I say something off the record?

37 **Brewster:** You may be recorded.

38 **[Man]:** I see a lot of people here and there's Spanish speakers and stuff like that. But like, let's be real.
39 If this, if this, if the avenue wasn't gentrified, would we really care? That's all I'm asking because I

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1 see everybody here and they're Americanized. I don't see any Spanish speakers but I see a lot of
2 Spanish speakers walking around the avenue. I'm just curious.

3 **Brewster:** We have several Spanish speakers here.

4 **[Man]:** Yeah, one or two but I'm just curious, would we really care if it was just, you know,
5 marginalized if it was a Spanish or like, would we really care?

6 **??:** Yes. **[inaudible - 01:14:35]**

7 **[Man]:** Would we really? Who said yes, you?

8 **Hosts:** Okay sir, let's ... we're going to go back to comments. Thank you for that input. This is a chance
9 to provide public comment and thank you for your comments.

10 **[Man]:** ... be off the record.

11 **Hosts:** We have a few people in the room who are waiting for quite a while. Let's go here on the end.
12 Thanks.

13 **[inaudible]**

14 **Hosts:** Can you please respect this community space?

15 **[inaudible]**

16 **Brewster:** I'm so sorry. **[inaudible]** Whenever you're ready. **[inaudible]**

17 **Juan Lattes:** Okay, awesome. Hi, my name is Juan Lattes, project director at the Climate Central Coast
18 Climate Justice Network but today I'll be speaking as a citizen of Ventura. Every single person that I
19 talked to, folks who have lived on the West Side, you mentioned the compressor plant – folks don't
20 know, so you know, acknowledging earlier comments, the fact is a lot of folks just don't have that
21 awareness and I think that's kind of the power of this moment is to look at the inspiration of the
22 future. And when you think about this, this dichotomy between these old ways of generating,
23 storing, and transferring energy located across the street from children, youth who we're seeing
24 impacted as was shared by many people here, folks who are experiencing cancer, folks are
25 experiencing respiratory issues, my ask and my nudge to the CPUC is to lead with the alternative as
26 the only option.

27 This expansion is not necessary. As folks know, they're scared, they've either had impacts
28 already to themselves or their loved ones. But this is an opportunity to prioritize that future and
29 kind of close the door on the past. So with that little sidetracked for those of you know, in the room.
30 But yeah, thank you for your time and you know, I think that this is definitely an opportunity. If
31 there's going to be continued engagement, work with community based organizations, work with
32 folks in Spanish, make sure that we have that outreach because the community that's been here,
33 they don't know, and that is something that needs to be acknowledged. And that is something we
34 need to be changing so I invite all of us to join together and do that work. **[Spanish]** Gracias, and
35 thank you for your time.

36 **Brewster:** Thank you.

37 **Brewster:** She just finished speaking. **[inaudible - 01:17:37]**

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1 **Brewster:** We have one more, are you available? And then, essentially, I won't enforce the 2 min hard
2 rule. Just trying to keep it [inaudible] just to warn you.

3 **Raquel Torres:** Good evening, everyone. My name is Raquel. [inaudible] I appreciate my neighbor. She
4 knocked on my door and gave me a pamphlet. She spoke to me in English [inaudible] but that
5 doesn't mean that we are not concerned about the community. [inaudible] Because we're not here
6 doesn't mean we don't care, I'm here because I want my voice to be heard. I want to help in any
7 way I can. I read the pamphlet that you left me and I could understand a lot. [inaudible] We need to
8 [inaudible] the compressor station from [inaudible] sure what the next step to take. I can be a voice
9 with other people [inaudible].

10 **Brewster:** Okay, thank you on Zoom for being patient. We have maybe one more in here I see.

11 **Woodrow:** I can be concise.

12 **Brewster:** Thank you. And then we'll move to Zoom and pick you up there.

13 **Woodrow:** My name is Woodrow. I also live nearby. I'm a long time Ventura County native and I just
14 think this is really important opportunity to make everyone's voices heard, and to know that human
15 lives are invaluable and it takes an exact dollar amount for them to move that compressor. And
16 when you weigh those 2 things out together, obviously one of those is a lot easier to get done.
17 Everyone's lives, everyone deserves to grow old and happy and live very healthy lives. Everyone
18 deserves that opportunity. And as a scientist, these are the exact things that you can do in order to
19 get that to happen. Thank you.

20 **Brewster:** Thank you. Okay. Now I know we have some folks on Zoom who would like to speak, and I
21 get the sense that you may not be able to hear them because the sound will be coming from the
22 little computer here. So this is not ideal. And we will turn the volume up and I will move to the folks
23 on Zoom in the order of their hands being raised. Let's see, where are my hands? So Michael J.
24 Shapiro has had the hand up for a very long time, and would be first and then Lyra next. Now for
25 Michael Shapiro, are you able to unmute and interested in speaking up?

26 **Michael J. Shapiro:** I'm unmuted. Yes.

27 **Brewster:** Okay, you are unmuted and as I feared, this will not be audible in much of the room but we
28 will hear you at the front.

29 **Michael J. Shapiro:** Okay, shall I begin?

30 **Brewster:** Yes, please.

31 **Michael J. Shapiro:** All right. I'm Michael Shapiro. I live in the Ojai Valley. I'm also a founding member
32 of CFROG. SoCalGas Company's proposed new supersized natural gas compressor is located in the
33 heart of a West Ventura community that we all know has already suffered grotesque environmental
34 abuse and degradation from the oil and gas industry for decades. That the proposed new supersized
35 gas compressor is located across the street from the EP Foster Elementary School, I think, is akin to
36 child abuse and frankly and realistically, I think criminal charges should be looked into very seriously
37 if this project is moved forward for the obvious reasons. The proposed supersized gas compressor
38 would be double the size of the current existing compressor, and that would obviously increase the

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1 toxic pollution that already is generated. It's bad enough that in 2017, NASA identified the current
2 compressor station as a soup quote, "super emitter of methane" and SoCalGas now wants to
3 expand that kind of polluting menace. Studies have also shown that the compressors currently
4 emitted methane gas travels on the prevailing winds all the way up and into the Ojai Valley itself
5 and the folks in Ojai find it unacceptable to increase unhealthful methane pollution there. The
6 project is also an environmental justice issue, because it will unequivocally cause an otherwise
7 avoidable harm. Once and for all it's time to finally remedy a legacy of pollution and industrial
8 degradation in Ventura's west side community. Thank you.

9 **Brewster:** Thank you. Thank you for your comment. Moving. I think, I'm not sure that I would do
10 justice by summarizing – Mr. Shapiro is against the project and it is environmental justice harm. The
11 recording and the transcript from Zoom will be posted as part of this scoping report, so his words
12 will be available for you to peruse after. We, I'm going to pause the Zoom public comment period
13 here for a moment and thank you, Mr. Shapiro, for your comments. We have a couple more hands
14 up online and I think I'll take a moment to say thank you to everyone in the room for being here.
15 And we value your input. This is a period of analysis for us, where we take the information that
16 you've given us, we go back to work on preparing the environmental impact report. We will be
17 documenting the concerns and providing as much information as we can in as easily digestible a
18 format as possible for the environmental impact report to be complete and compliant.

19 I want to be, I want to be frank, though, that for the folks on Zoom, people in the room will not
20 be able to hear you. The room is too large and we don't have a PA system at this meeting. Perhaps
21 we need to have a more robust audio visual system for everyone in the room to hear online as well
22 as in-person comments, and that will be something that we look forward to when it comes time for
23 the draft EIR and we have more public meetings at that point in the process.

24 So I want to close with that commitment and the folks on Zoom, we are here and we are going
25 to work through your comments. I just wanted you to hear that. Unfortunately, in the room here at
26 the Bell Arts Factory, it's almost impossible to hear you just because of the way things are set up.
27 Comments will be recorded it says on our screen, So with that, I'm ready to move on to more Zoom
28 comments and for anyone who wants to come close and listen in, please do, and for others, thank
29 you and we hope to see you again. Thank you.

30 Okay, so back to Zoom, 3 more hands raised on Zoom. Is that right?

31 Yes.

32 Okay, thank you.

33 **[inaudible - 01:27:49]**

34 **[???]:** Good afternoon. We have interpretation for this event and to record your messages. Is there
35 anyone that wants to give the comment in Spanish? We can interpret for you. **[Spanish]**

36 **01:27:59 [inaudible]**

37 **Grace:** Okay, Lyra, I'm going to go ahead and allow you to unmute yourself so you can unmute yourself
38 when you're ready and then please start your comment.

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1 **Lyra Cabanban:** Thank you. Okay. Good evening Commission staff. My name is Lyra and I'm a student
2 at Oxnard College and a fellow at CFROG. As an older sister to younger siblings, the idea of
3 expanding this dangerous compressor station located across the street from an elementary school is
4 deeply concerning. And so I'm here today to urge you to do a few things.

5 First, I'm urging you to thoroughly study and consider the public safety concerns related to this
6 proposed expansion in the Environmental Impact Report. Compressor stations are at a high risk of
7 explosion and put hundreds of children and families within what's called an incineration zone,
8 meaning that if an explosion were to ever occur, anyone in the surrounding zone would be
9 immediately incinerated.

10 Furthermore, SoCalGas, the operator proposing this expansion, is the same operator
11 responsible for the 2015 Aliso Canyon disaster, the largest natural gas blowout in U.S. history. How
12 can we trust that SoCalGas can responsibly manage and operate their facilities and prevent a
13 disaster like this from happening in our community?

14 The second thing I'm urging the Commission to do is to study alternative locations for this
15 compressor station that are located far away from home, schools and businesses. I am also urging
16 the Commission to explore less polluting designs for this compressor station that rely on clean
17 energy and electric sources as opposed to fossil fuels. Thank you.

18 **Brewster:** Thank you for that. [inaudible - 01:31:05] Moving to Molly.

19 **Molly McCoy:** Good evening, Commissioners. My name is Molly McCoy and I'm calling in tonight as a
20 lifelong Ventura County Resident, and in solidarity with the Westside Clean Air Coalition Climate First
21 Replacing Oil and Gas. First, thank you so much for this hybrid, the comment opportunity, and
22 allowing everyone to share their voices on this critical project. We'd also like to echo the calls to
23 improve community outreach, to ensure that everyone is aware of what SoCalGas is trying to build
24 behind their backyards and playgrounds.

25 The last thing we need is to prolong our dependence on fossil fuels which will only worsen the
26 surrounding air and noise pollution. We completely understand that there's an existing gas
27 infrastructure network designed to support the site and that California's energy needs are only
28 going to continue to grow. But I also know that California has a looming deadline to electrify and
29 decarbonize its electric grid by 2045. So why are we trying to expand the station, in the first place,
30 rather than exploring scientifically proven renewable alternatives that will safely and equitably
31 transition away from an oil and gas economy, especially given the immediate need to address the
32 climate crisis and environmental injustice implications.

33 The west side of Ventura has been legally recognized as a Senate Bill 535 disadvantaged
34 community. It has a high level of environmental pollutant burdens as per CalEnviroScreen 4.0, not
35 just from the SoCalGas site, but highway 33, the nearby agricultural and oil and gas fields.

36 The project EIR must reflect this reality in the community's health and safety concerns if the
37 Commission is going to truly follow environmental justice procedures. 4 years ago as a high school
38 senior, when I first learned about the plans to expand the compressor station and saw it in person, I
39 was shocked by how close the station was to EP Foster Elementary School and so many homes.

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT

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1 Now, as a graduating environmental policy college student, I am still just as shocked that despite
2 the many State statutes and programs designed to protect frontline communities, this project is still
3 under serious consideration.

4 We join the many people tonight urging you the Commission to fully evaluate the compressor's
5 impacts and keep the community's best interests in mind, not just corporate ones. Please don't turn
6 away from your constituents and deny them the right to a clean, healthy, and safe neighborhood.
7 Thank you for your time.

8 **Brewster:** Thank you for your comments, and thank you for being patient. And next up would be Laura.

9 **Laura Rosenberger Haider:** Hello! This is Laura Rosenberger Haider of Residents Against Fracking. A
10 2017 study identified 70 different air pollutants in compressor station emissions, a 2019 study
11 found that 39 of the chemicals released are linked to cancer. A 2021 study found alarming levels of
12 volatile organic compounds, including cancer-causing benzene in the indoor air of homes located
13 near a compressor station in Ohio and I heard also that radiation was emitted by the Ventura
14 Compressor Station or radioactive pipe scale was emitted, I need some more details of that.
15 Hopefully it's in the report, and also it ... the whole natural gas infrastructure has problems and
16 that's why I think we should stop extracting oil and gas in the first place. All right. And they think it'll
17 get worse with deregulation.

18 The 2022 study of natural gas gathering lines showed leakage 4 to 13 times higher than the
19 highest estimate derived from ground-based surveys and in the 2022 study of the methane
20 emissions from natural gas gathering pipelines in the Permian basin found leakage rates 14 through
21 52 times higher than the U.S. EPA's national estimate for gathering lines and also this unsafe
22 because the 2022 study of gas pipelines found that between 2002 and 2021, I think, in the United
23 States, the gas pipeline incidents caused at least a thousand injuries and 227 fatalities. And this is
24 from ... there's a lot more incidents of pipeline disasters and carbon capture projects that did fail to
25 capture the it. I think it would also failed to capture, to keep the natural gas underground also. I'm
26 still looking into that. The natural gas explosion in Merrimack Valley, Massachusetts.

27 Alright. Let's get on this. The reference of this is Concerned Health Professionals [inaudible -
28 01:36:09] Medical Findings Demonstrating the Risks and Harms of Fracking. 2023 Ninth Edition.
29 Thanks.

30 **Brewster:** Thank you for your comments. If you have this information in writing and would submit it to
31 the email address, that will be helpful too. I appreciate the input here.

32 **Laura Rosenberger Haider:** Some of it's in the chat.

33 **Brewster:** Excellent. This is the last raise hand and I see no more on Zoom at this moment so I believe
34 we will close this hybrid portion of the meeting. Thank you all for your attention online, and thank
35 you for your patience while we have the presentation in the room here in Ventura. Please
36 comments in writing before April 30th would be the most helpful, and we look forward to hearing
37 from you in that format. We'll close it off and at this point, good night.

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT

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ZOOM CHAT CONVERSATIONS

Copy of: "meeting_saved_chat.txt"

19:01:25 From Laura Rosenberger Haider to Hosts and panelists:

I oppose the Ventura Compressor because the community near the station should not continue to experience unannounced releases of toxic chemicals that lead to nosebleeds and headaches.

19:22:36 From Laura Rosenberger Haider to Hosts and panelists:

A 2019 study found that compressor stations released 39 carcinogenic chemicals including benzene. (p 478*)"A 2022 study of methane emissions from natural gas gathering pipelines in the Permian Basin found leakage rates 14- 52 times higher than the U.S. EPA's national estimate for gathering lines...". (p. 478-479*)

19:34:11 From Laura Rosenberger Haider to Hosts and panelists:

Let's stop extracting oil and gas. "A 2022 study of gas pipelines found that between 2002- 2021, gas pipeline incidents caused at least 1000 injuries and 227 fatalities" (p479). It could get worse when federal regulations are not enforced.

* Reference: Concerned Health Professionals of New York and Physicians for Social Responsibility, "Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking and Associated Gas and Oil Infrastructure (Ninth Edition)," October 2023, <http://concernedhealthny.org/compendium/> : <https://concernedhealthny.org/wp-content/uploads/2023/10/CHPNY-Fracking-Science-Compendium-9.pdf>

19:40:54 From Alyssa to Hosts and panelists:

(I have a crying baby with me so no mic) Hi, my name is Alyssa and I am a concerned resident of 30 years. I grew up by the oil fields on Ventura Avenue and I had regular nosebleeds when I was a kid. I attended EP Foster Elementary School and I also went to the Boys and Girls Club after school.

My biggest concern with this project is how close the site is to the places that we send our youngest children. The compressor site, a super emitter of methane, is located right across the street on N Olive St. Our kids deserve better.

With all of the recent modernization developments across Ventura, approving the expansion of this site would be an environmental injustice to the community on Ventura Avenue. While knowing the health and environmental risks expressed by the community tonight, approving this project would be a huge step backwards.

Please consider moving this project far away and rezoning the land next to our schools, thank you.

Attachment 5

WRITTEN SCOPING COMMENTS

Ventura Compressor Station Modernization Project

From: Kari Cameron <Kari.Cameron@bbklaw.com>
Sent: Tuesday, April 29, 2025 4:04 PM
To: Ventura Compressor Station Modernization Project; john.forsythe@cpuc.ca.gov
Cc: jack.mulligan@cpuc.ca.gov
Subject: A.23-08-019 Ventura Compressor Station - Scoping Comments of City of Buenaventura
Attachments: City of Ventura 4-29-25 Comments in Response to NOP in A23-08-019 (Ventura Compressor Station)-final-c1.pdf

Attached are the COMMENTS OF THE CITY OF SAN BUENAVENTURA ON NOTICE OF PREPARATION OF DRAFT EIR (scoping comments) of the City of San Buenaventura, California, a municipal corporation, in response to the Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting for the Ventura Compressor Modernization Project.



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**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

Application of Southern California Gas Company
(U904G) for a Certificate of Public Convenience and
Necessity for the Ventura Compressor Modernization
Project

Application 23-08-019

**COMMENTS OF THE CITY OF SAN BUENAVENTURA
ON NOTICE OF PREPARATION OF DRAFT EIR**

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Buena Ventura, California, a
municipal corporation*

April 29, 2025

- 1 -

**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE
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Application of Southern California Gas Company
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**COMMENTS OF THE CITY OF SAN BUENAVENTURA
ON NOTICE OF PREPARATION OF DRAFT EIR**

The City of San Buenaventura (Ventura or City) hereby submits its Comments on the Notice of Preparation (NOP) of Draft Environmental Impact Report (EIR).

I. General Points

A. Ventura strongly objects to the Proposed Project and to the continued operation of the existing compressor station, which is located in an Environmental and Social Justice (ESJ) Community.

B. The primary reason Ventura objects to the Proposed Project and continued operation of the existing compressor station is because they both represent a clear and present danger to the safety and health of the community.

C. SoCalGas has shown itself as arrogantly indifferent to the health and safety of the community and the Proponent's Environmental Assessment (PEA) cannot be relied upon in preparing the Draft EIR.

D. SoCalGas has admitted to Ventura, during the course of this proceeding that **“No health study exists on the health effects of methane from the Ventura Compressor Station.”**¹

E. SoCalGas management, sitting in a mirrored high-rise in downtown Los Angeles ignores health (including San Joaquin Valley Fever identified by SoCalGas’ PEA) and safety (including explosion and fire resulting from rupture because the Proposed Project is sited in a Liquefaction Hazard Zone, also identified by the PEA) risks which will be borne by residents of the West Side of Ventura, including young children. The City urges CEQA Staff to carefully analyze these dangers to health and safety.

F. The Proposed Project will increase the Affordability crisis facing utility ratepayers.

G. The Proposed Project (which SoCalGas states might cost up to \$731 million) is a waste of ratepayers’ funds on an unneeded project.

H. The Commission Staff and its consultants (collectively referred to herein as CEQA Staff) should evaluate SoCalGas’ Response to Data Requests in SoCalGas’ General Rate Case (A22-05-015) which refers to the Proposed Project and in A23-08-019 in preparing the Draft EIR.

I. CEQA Staff should incorporate the Commission’s ESJ policy in the Draft EIR and reject the Proposed Project in its entirety because it violates Section VI.A.4.c of General Order (GO) 177.

J. CEQA Staff should address unintended consequences² of the Proposed Project in the Draft EIR and reject the Proposed Project in its entirety. For example, the PEA admits that the

¹ SoCalGas responded to Ventura’s Initial Data Request 10.f (**“Please produce all Documents that study the health effects of methane leaks from the Ventura Compressor Station for the previous 10 years.”**) with this troubling response. Bold is added to all data requests and responses.

² The Commission often uses unintended consequences in analyzing proposals. *See, e.g.*, D.23-12-005, 2003 Cal. PUC Lexis 593 at *151 (“However, at this time we decline to reduce the dispatch window for sub-group A.6 only. This could lead to large amounts of confusion amongst program participants and could have unintended consequences.”);

Proposed Project “has the potential to lead to the spread on San Joaquin Valley fever.”³ What if school children, across the street from the Proposed Project, get that fungal infection?

K. The NOP correctly⁴ seeks alternatives to the Proposed Project, and notes several—but not all -- reasonable alternatives. These missing alternatives include Pacific Gas & Electric Company (PG&E) service to the North Coastal Region System. The Draft EIR must include all reasonable alternatives.

II. The Draft EIR Should Consider the Alternative of PG&E Serving the North Coastal Region System Rendering SoCalGas’ Proposed Project and their Existing Ventura Compressor Station Unnecessary

The PEA conceals the alternative of having PG&E serve SoCalGas’ North Coastal Region System.

This violates the PEA Guidelines which require the Description of Alternatives (Chapter 4) to “emulate the level of detail provided in typical CPUC EIRs.”⁵ The PEA does not come remotely close to that standard.⁶

D.23-08-005, 2023 Cal. PUC Lexis 405 at * 9-10 (“While we recognize the benefits of D.22-12-054’s intent, we must weigh such perceived benefits against the realities of implementation and the offsetting of regulatory risks for unintended consequences as well as obtaining the maximum value for each ratepayer dollar spent.”) and D.23-04-034, 2023 Cal. PUC Lexis 153 at * 21-22 (“Therefore, we direct the Joint IOUs to do the following, at a minimum:...and protect the public from unintended outcomes by ensuring that program aspects remain consistent with the primary goals of the MIP under D.21-01-018.”).

³ See, Section VI. A, below.

⁴ Both GO 177 and the Assigned Commissioner’s Ruling in A.23-08-015 require that the PEA inform the Commission of reasonable alternatives to the Proposed Project.

⁵ PEA Guidelines, pp. 2-3. The PEA guidelines require a much higher standard for Description of Alternatives than for other sections of the PEA. The PEA Guidelines requirements for the Environmental Analysis (Chapter 5) and the Comparison Environmental Analysis (Chapter 5) and the Comparison of Alternatives (Chapter 6) are less demanding than Description of Alternatives.

⁶ The City had identified this in writing to SoCal Gas and would have discussed it with SoCalGas had SoCalGas cancelled the meeting with the City apparently because SoCalGas wanted to prevent discussion of this alternative.

CEQA Staff should not fall into SoCalGas' trap and the Draft EIR should study this alternative. This alternative would render the Proposed Project unnecessary. It would also make the existing Ventura Compressor Station unnecessary and could begin to address an injustice imposed on vulnerable populations (including an elementary school and two day-care programs for young children) and an ESJ community for almost a century.

The entire Application is premised on the alleged need to serve SoCalGas' North Coastal Region System including the Goleta Storage Field.⁷ PG&E has been serving some or all the North Coastal Region System for years. Transferring the duty to serve to PG&E might well be in the best interests of North Coastal Region System customers and to other SoCalGas customers who will avoid the investment of over the half-billion dollars the Proposed Project will cost.

SoCalGas' animus to this alternative is easy to understand: it would deprive SoCalGas of an opportunity to increase its ratebase. According to SoCalGas' Application, the Proposed Project represents a ratebase opportunity of at least half a billion dollars to three-quarters of a billion dollars. Given that investor-owned utility (IOU) projects frequently exceed original estimates, the likely increase in ratebase of the Proposed Project will probably end up being over a billion dollars. On March 20, 2025, SoCalGas filed an Application with the Commission (A.25-03-011) seeking return on equity invested in ratebase of 11.0%.⁸ This is for natural gas, which is a disfavored fossil fuel in the State of California⁹ with substantial greenhouse gas emissions.

SoCalGas' responses to the City's Data Request make it very clear that it did nothing to

⁷ See, e.g., Application, p.56

⁸ That is an enormous increase from the currently authorized 10.08% to 11.0%. SoCalGas attempts to justify this enormous increase by claiming that it faces more risk than other investment-grade gas utilities, based on the policies of the State of California and the Commission which disfavor natural gas. A25-03-011, Prepared Direct Testimony, Chapter 3, pp. JCN 37, JCN 40-45

⁹ See, A.25-03-011, Prepared Direct Testimony, Chapter 3, pp. JCN37, JCN 40-45.

evaluate the Northern Service alternative.

Initial Data Request 6.o was: **“Did You study the alternative of transferring the duty to serve the North Coastal System, in whole or in part, to PG&E? If so, please provide copies of all Documents that relate thereto.”** SoCalGas’s response to 6.o was: **“No.”**

SoCalGas’ unequivocal response should eliminate any contention that SoCalGas gave any consideration to this alternative and rejected it on the grounds of feasibility, environmental impact or cost. Additionally, the City asked several additional questions relevant here and SoCalGas’ responses reiterate its failure to consider this alternative. The City had raised this alternative with SoCalGas so it was aware of this alternative. The only reason why SoCalGas didn’t address it in the PEA is that SoCalGas wished to suppress consideration of this alternative.

Data Request 6.p was: **“Did You study whether it would be in the best interests of customers in the North Coastal System to transfer the duty to serve the North Coastal System to PG&E? If so, please provide copies of all Documents that relate thereto.”** SoCalGas’s response to 6.p was: **“No.”**

Data Request 6.q was: **“Did You study whether it would be in the best interests of Your remaining customers to transfer the duty to serve the North Coastal System to PG&E? If so, please provide copies of all Documents that relate thereto.”** SoCalGas’s response to 6.q was again: **“No.”**

Finally, if any doubt remains that SoCalGas refused to consider the Northern Service alternative, its response to Data Request 6.r makes it clear that SoCalGas failed to perform any evaluation of that alternative.

Data Request 6.r asked: **“Did You identify or study the costs, if any, of expanding either Your or PG&E’s facilities so that PG&E can serve the North Coastal System? If so, please**

provide copies of all Documents that relate thereto.” SoCalGas’s response to 6.r was: **“No.”**¹⁰

Please note that the Data Request and the response is not limited to PG&E serving the North Coastal Region System. It explicitly includes expanding the SoCalGas system. SoCalGas’ response makes it quite clear that, determined to impose the Proposed Project on the City and its residents, SoCalGas did nothing to **“identify or study the costs”** of the Northern Service alternative.

The PEA provided no analysis of why the PG&E service alternative was not included.¹¹

III. Devil's Canyon Road Site and Other Compressor Station Site Alternatives

The NOP correctly identifies three Compressor Station Site Alternatives. All of them are worthy of consideration in the Draft EIR.¹²

One of the three locational alternatives is the Devil’s Canyon Road site, which prior to filing A23-08-019, SoCalGas had identified as the environmentally preferred location¹³ and acknowledged it is technically feasible.¹⁴ It is not located in an ESJ Community and has less

¹⁰ Given SoCalGas’ March 20th A.25-03-XXX, where it seeks an 11.0% return on equity—an enormous increase—it Seems clear that PG&E can serve the North Coastal Region System less expensively than SoCalGas.

¹¹ The Application, (not the PEA), at page 18, makes an argument against the Northern Service Alternative. SoCalGas’ Data Responses, quoted above, prove that SoCalGas did not study this alternative.

¹² In addition to locational Alternatives, CEQA Staff should also consider the PG&E (*see*, Section II, above), non-pipeline and configuration (*see*, Section IV, below) alternatives.

¹³ Feasibility Study of Potential Alternatives Ventura Compressor Station Modernization Project March 2022 Prepared by SoCalGas with technical input from Dudek, Burns & McDonnell, and SPEC Services (c) 2022 Southern California Gas Company, Executive Summary, p. xii, Table ES-2 Results of Evaluation.

¹⁴ Feasibility Study of Potential Alternatives Ventura Compressor Station Modernization Project March 2022 Prepared by SoCalGas with technical input from Dudek, Burns & McDonnell, and SPEC Services (c) 2022 Southern California Gas Company, *passim*.

population density around the site. Any of the three alternative sites is far more acceptable to Ventura.¹⁵

Contrary to Section VI.A.4.c of GO 177, and contrary to the misleading statement in the Application¹⁶, the PEA fails to reveal that SoCalGas took no steps to locate the Proposed Project outside of the ESJ community.¹⁷

IV. Non-Pipeline Alternatives Other Than Transferring the Duty to Serve to PG&E

The PEA does discuss non-pipeline alternatives to the Proposed Project such as electrification, energy efficiency and use of Renewable Natural Gas and dismisses all of them. However, it does so using a false premise: SoCalGas takes the position that each of these non-pipeline alternatives must provide 100 % of the end-use natural gas in the North Coastal Region. This imposes unrealistic feasibility and cost estimates on each of the alternatives.

The correct test should have been whether these non-pipeline alternatives, taken in the aggregate, would mitigate the alleged need; that would inform the Commission whether the Proposed Project, an alternate project or no project is needed in the public interest.

¹⁵ The PEA dismissed these sites without adequate explanation.

¹⁶ See, At footnote 60 on page 101 of the Application, SoCalGas stated that it “reached out to the property owner.” That might suggest that the property owner refused to sell or set an exorbitant price. However, SoCalGas’ responses the City’s Initial Data Request 14 made it clear that nothing of the sort occurred.

¹⁷ The City’s Data Request 14.a was: **“Please identify all actions You undertook to determine whether You could purchase, lease, or otherwise occupy this site for a new compressor station.”** SoCalGas’s response to 14.a was: **“Property ownership identification.”**

Data Request 14.b was: **“Regarding Footnote 60 at Page 101 of the Application, please explain what You mean that You “reached out to the property owner.”** SoCalGas’s response to 14.b was: **“See attached correspondence.**

Attachment:VCM_A2308019_CoV_SCG_01_Q14_Attach_01_DevilsCanyonRoadCorrespondence”

SoCalGas’ statement that it “reached out to the property owner” is highly misleading. Instead, SoCalGas sent form letters (probably sent to numerous persons) and probably disregarded by the recipient. Note that the letters do not inquire as to whether the owner was interested in selling or at what price.

Data Request 14.c was: **“Did You make an offer to purchase this site?”** SoCalGas’s response to 14.c was: **“No.”**

CEQA Staff should analyze reasonable non-pipeline alternatives in the Draft EIR. Specifically, CEQA Staff should analyze the cumulative effect of the non-pipeline alternatives.

V. Compressor Station Configuration Alternatives

The PEA does discuss alternative configurations for the Proposed Project, including the use of electrically-powered generators. SoCalGas continues to insist that two of the four compressors be powered by natural gas. It is undisputed that use of natural gas compressors will pollute the City and the ESJ Community and emit greenhouse gases. SoCalGas attempts to justify the configuration of the Proposed Project by asserting the unreliability of electric supply by Southern California Edison Company (SCE). However, SoCalGas has provided no evidence that SCE service at the site is unreliable. More importantly, SoCalGas fails to provide the Commission with sufficient information that electricity interruptions would be meaningful because the Proposed Project is intended to inject gas into the Goleta Storage Field. Inasmuch as storage injection does not have to be uninterrupted, SoCalGas' entire argument about uninterrupted electric supply should be questioned by the CEQA Staff.

The CEQA Staff should investigate both: (1) the alleged unreliability of SCE electric supply and (2) why a continuous supply of electricity is necessary. In addition, CEQA Staff should analyze the substantial increase in capacity of the Proposed Project and determine whether it is appropriate and can be served by electric compressors.

VI. Immediate Health and Safety Issues

A. The Proposed Project Would Expose the Community to the Risk of San Joaquin Valley Fever

The analysis in Section 5.3d of the PEA at page 259, states that “[a]lthough fugitive dust during construction has the potential to lead to the spread of San Joaquin Valley fever,” the PEA

summarily dismisses this danger by arguing that “impacts related to dust disturbance would be less than significant given the limited construction activities and disturbed nature of the site.” This statement is conclusory and not supported by substantial evidence. More importantly, this indifferent and arrogant attitude ignores the impact on people, particularly children who are exposed to coccidioidomycosis. This fungal infection can be serious or even fatal.

In addition, contrary to the blithe statement of the PEA, construction activities are not limited in scope or duration. There will be grading, trenching, and excavation, and construction activities are expected to last 30 months. SoCalGas might consider that “less than significant,” but Ventura and the residents of the Westside Community, do not consider that “less than significant”. Neither should the Commission, given its commitment to public safety, the ESJ Plan and the extraordinarily close proximity of sensitive receptors such as the students attending the E.P. Foster Elementary School.

CEQA Staff should analyze whether there is any risk to the community’s residents – particularly sensitive receptors – of exposure to San Joaquin Valley Fever, as the result of the Proposed Project.

B. The Proposed Project Would Expose the Community to Danger of Fire and Explosion Because the Proposed Project Is in a Liquefaction Hazard Zone

The PEA, at Section 5.7(c), at page 330, admits that the “Project Site is in a liquefaction hazard zone and would be potentially subject to liquefaction during a seismic event.” The PEA goes on to dismiss this hazard by claiming it would be addressed through “standard geotechnical engineering.” This conclusory lack of safety concern has, all too often, resulted in disasters and should be rejected by the Commission.

Elsewhere in the PEA, it acknowledges (but tries to minimize) the danger of fire or a “gas leak or gas-related explosion”. (Section 5.20.4, page 588). The City does not concur with the PEA’s efforts to minimize the risk, but this basic fact remains: the PEA admits that these risks exist.

The risk of pipeline rupture, fire and explosion increases radically when the Proposed Project is located in a Liquefaction Hazard Zone. The CEQA Staff should ask why, for Heaven’s sake, should the Commission authorize a major compressor station and large-diameter natural gas pipelines built on a Liquefaction Hazard Zone? Especially in a densely populated area after the tragic experience of the San Bruno explosion and fire. Especially when feasible alternatives exist.

CEQA Staff should require SoCalGas to demonstrate by quantifiable evidence that there is no risk of fire or explosion as a result of the Proposed Project.

C. The Proposed Project Would Expose the Community to Danger of Release of Hazardous Materials

Section 5.9b of the PEA addresses whether the project would create a significant hazard to the public or the environment through reasonably foreseeable accident conditions¹⁸ releasing hazardous materials into the environment. (PEA, p. 378). The PEA states, at page 378, that “The facility would be designed to incorporate best available technology and safeguards for the protection of the general public, environment, personnel working in and around the” These are vague platitudes. There are no assurances that the final project design will actually include these features or that they will be adequate.

¹⁸ PEA, p. 327 “...based on proximity to regional active faults, strong ground shaking can be expected at the Development Area during moderate to severe earthquakes in the general region...A preliminary geotechnical investigation conducted by Wood in 2019 (Appendix I) provides specific recommendations related to soils and seismic engineering, including recommendations for remedial grading, foundation design, and retaining walls, thus minimizing the potential for structural distress as a result of seismically induced ground shaking.”

CEQA Staff should demonstrate by quantifiable evidence the risk of release of hazardous materials as a result of the Proposed Project.

D. The Proposed Project Would Increase Emission of Greenhouse Gases

PEA, page 357 discusses emissions of greenhouse gases and argues that there is less than significant impact, but does not clearly state whether the increase in emissions would be in conflict with AB 32, SB 32 and AB 1279.

CEQA Staff should analyze in detail the impact of the Proposed Project and of the continued operation of the Ventura Compressor Station on these statutory provisions and on the Commission's decarbonization objectives.

VII. The Proposed Project Disregards the Commission's Intent to Protect ESJ Communities

Section VI.A.4.c of GO 177 requires:

"If the proposed project is located within an Environmental and Social (ESJ) Community as defined in the most recent version of the Commission's ESJ Action Plan, the discussion of alternatives shall discuss whether it is possible to relocate the project and, if so, steps taken to locate the project outside such areas;" (emphasis added).

This is a significant requirement. It requires the discussion of alternatives to address whether it is possible to relocate the project. It is certainly possible to relocate the Proposed Project.

The Devil's Canyon Road site is, by SoCalGas's admission, not only "possible" but actually "feasible". That site is not within an ESJ Community and also has far less population density, meaning that exposure to emissions and possible fire/explosion would impact far less

people. SoCalGas does not comply with GO 177's requirement that it describe "steps taken to locate the project outside" an ESJ Community.¹⁹

VIII. Communications

Communications concerning this matter should be addressed to:

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Walnut Creek, CA 94596
Telephone: (925) 977-3323
Facsimile: (925) 977-1870
E-mail: hgolub@bbklaw.com

With a copy of written communications to:

Javan N. Rad, City Attorney
Miles Hogan, Sr. Asst. City Attorney
Yesania Anderson, Asst. City Attorney
City of Ventura
501 Poli Street, Room 213
Ventura, California 93001
Telephone: (805) 654-7818
E-mail: jrad@cityofventura.ca.gov, mhogan@cityofventura.ca.gov,
yanderson@cityofventura.ca.gov

IX. Conclusion

The City of San Buenaventura strongly recommends that the Draft EIR should reject the Proposed Project because it has significant unavoidable environmental, health and safety consequences, and violates GO 177, particularly Section VI.A.4.C, that the existing Ventura Compressor Station be closed because it represents a clear and present danger to vulnerable populations and to an ESJ community. Instead, the Draft EIR should confirm that better

¹⁹ In fact, based on SoCalGas' Response to the City DR 14, SoCalGas has not even entered into discussions with landowners at the Devil's Canyon Road site, which is an obvious first step.

alternatives exist. For example, the locational alternatives, particularly the Devil's Canyon Road Site, is far better than the Proposed Project. Another alternative is PG&E service to North Coastal Region System; that has the potential of a far less expensive alternative to the Proposed Project. The cumulative impact on non-pipeline alternatives might also be superior to the Proposed Project. Finally, all-electric compressors would have less adverse impact on the surrounding ESJ community than the Proposed Project.

The Proposed Project has so many adverse effects on the environment and health and safety of an ESJ community that it must be rejected.

Dated: April 29, 2025

Respectfully submitted,

/s/ Howard V. Golub

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- 15 -

Ventura Compressor Station Modernization Project

From: Bayless, Timanii <Timanii.Bayless@cpuc.ca.gov>
Sent: Wednesday, April 30, 2025 4:03 PM
To: Forsythe, John
Cc: Ventura Compressor Station Modernization Project; APatel@SoCalGas.com; NPedersen@HanMor.com; Yip-Kikugawa, Amy C.; MVespa@Earthjustice.org; HGolub@BBKlaw.com; Rebecca@LozeauDrury.com; CentralFiles@semprautilities.com; klatt@energyattorney.com; Christenson, Jordan; AMcKean@SoCalGas.com; AWhatley@SoCalGas.com; EGressle@SoCalGas.com; JLSalazar@SoCalGas.com; JMock@SoCalGas.com; srangel@socalgas.com; Timothy.Lyons@bbklaw.com; CentralFiles@SempraUtilities.com; Kristian@CauseNow.org; Lucia@CauseNow.org; Bundy@SMWlaw.com; Singh Birmingham, Amanda; Fisher, Arthur "Iain"; Neuman, Audrey; Gruen, Darryl; Gregory Heiden; Spencer, Jean; Taul, Matthew; Bawa, Niki; Haga, Robert; Brewster Birdsall; AStatler@Earthjustice.org; ANavarro@Earthjustice.org; MDeGasperi@Earthjustice.org; Jin@Decodees.com; C6BO@pge.com; dawn.forgeur@bbklaw.com; Regulatory@Stoel.com; MCade@Buchalter.com
Subject: Public Advocates Office Comments on NOP for Draft EIR Report in Ventura Modernization Project
Attachments: Public Advocates Office Comments on NOP for Draft EIR Report in Ventura Modernization Project.pdf

Attached please find *Public Advocates Office Comments on NOP for Draft EIR Report in Ventura Modernization Project*.

Thank you,

Timanii C. Bayless
Legal Secretary
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: 916.823.4780
Email: timanii.bayless@cpuc.ca.gov



April 30, 2025

Via Electronic Mail

John E. Forsythe
Project Manager for the Ventura Compressor Modernization Project
CPUC Energy Division, CEQA and Energy Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814
john.forsythe@cpuc.ca.gov

Subject: Comments of the Public Advocates Office on the Notice of Preparation of an Environmental Impact Report for the Southern California Gas Company Ventura Compressor Station Modernization Project

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Ventura Compressor Station Modernization Project published on February 28, 2025.¹ The NOP requests that interested parties provide comments on environmental concerns to be included in the Draft EIR.²

The Draft EIR Should Analyze the Impacts of Individual Compressors in the Environmental Review of the Proposed Project and Alternatives

Cal Advocates is party to the Commission's Ventura Compressor Modernization Application (A.) 23-08-019 (Application). As part of our protest, we requested that the Commission determine whether the Proposed Project and Alternatives are the correct size to meet current and anticipated gas demand, reduce the risk of stranded assets, and meet

¹ Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting for the Ventura Compressor Modernization Project dated February 28, 2025 (NOP), available at: https://ia.cpuc.ca.gov/environment/info/aspen/venturacompressor/pea/CPUC%20VCM%20NOP_2-28-2025_434.pdf [accessed March 24, 2025].

² NOP at 1.

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California's goals to reduce Greenhouse Gas emissions.³ The Application promotes six configurations of the Proposed Project and Alternative sites to undergo further study. All six configurations presuppose the need for four compressors to meet Southern California Gas Company's (SoCalGas) anticipated gas demand.⁴ The six configurations and alternative sites are described in the Application section titled "Alternatives Considered Further" under the following sections: The Proposed Project, Supplemental Electric-Driven Compressor Installation Only Alternative, Avocado Site Alternative, Devil's Canyon Road Site Alternative, Ventura Steel Site Alternative, and No Project Alternative.⁵ In our protest, Cal Advocates challenged SoCalGas' demand assumptions and is currently assessing whether a smaller alternative consisting of fewer than four compressors would reliably serve the system and customer needs and reduce stranded asset risks. Specifically, Cal Advocates found that while SoCalGas presents three alternative sites and one alternative configuration which replaces one gas compressor with a third electric compressor, SoCalGas does not present information on whether and how using fewer compressors would affect deliverability to La Goleta and the ability to serve ratepayers. Therefore, the Commission should determine whether the project is the correct size for its stated service and reliability goals or whether a smaller alternative would suffice.⁶ Both Cal Advocates and SoCalGas agree that these issues belong in the scope of A.23-08-019.⁷

Cal Advocates is concerned that the current NOP narrowly defines both the Project Description and Alternatives, in a manner similar to the definition in SoCalGas' Application. Specifically, the NOP echoes the Application when it defines the Project Description as:

...replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal HP (estimated horsepower), electric-motor-driven

³ *The Public Advocates Office Protest of Southern California Gas' Application for a CPCN for the Ventura Compressor Modernization Project*, October 6, 2023 (Cal Advocates Protest) at 1.

⁴ *Application of Southern California Gas Company (U 904 G) for a Certificate of Public Convenience And Necessity for the Ventura Compressor Modernization Project*, August 29, 2023 (Application).

⁵ Application at 94-107.

⁶ Protest, at 2.

⁷ *Southern California Gas Company's (U 904 G) Reply to Protests of its Application for a CPCN for the Ventura Compressor Modernization Project*, October 16, 2023 (Reply to Protests) at 1-2.

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compressors (electric compressors), with zero nitrogen oxide (NOx) emissions, resulting in a “hybrid” compressor station.⁸

This narrow definition precludes alternatives in the environmental review that could operate with fewer than four compressors or operate in different combinations of gas and electric compressors.

Moreover, by establishing that there would be two new natural gas compressors and two new electric-motor-driven compressors in the definition of the Project Description, the NOP implies that the Draft EIR will evaluate the environmental impact of the Proposed Project as though this current four-compressor configuration is the only workable, technical solution. Providing an environmental review of the configuration presented in the Application is unnecessarily restrictive this early in the process and potentially precludes other configurations that could better serve customers and the system.

Cal Advocates recognizes that the NOP and Draft EIR are not the place to discuss matters of project need, project cost, and stranded asset risks.² The environmental review process, however, needs to ensure that the Commission has flexibility to select a smaller project with fewer compressors that may reduce project costs and minimize stranded asset risk. Therefore, Cal Advocates requests that the Draft EIR clearly break down and disclose the environmental impacts of individual compressors. This will enable selection configurations other than the proposed four-compressor configuration seen in the Application and eliminate the need for a supplemental or subsequent EIR. Cal Advocates recommends that when performing the environmental review of the Proposed Project and Alternatives, the CEQA Team presents its review of the environmental impact of each of the component parts individually. For example, one 1,900 HP natural gas compressor should be scored against its probable environmental impact pursuant to CEQA Guidelines Appendix G. This would allow for parties in the concurrent proceeding the ability to advocate for alternate numbers and configurations of electric and gas compressors and provide confidence that any permutation will have undergone environmental review.

⁸ NOP at 2.

² NOP at 5, which states, “Non-environmental issues such as the costs of the project and the assessment of project need are outside the scope of CEQA and will not be addressed in the EIR. These issues may be addressed through the CPUC’s concurrent general proceeding for the Proposed Project ([A.23-08-019](#)), as required by CPUC General Order 177.”

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Please contact Arthur (Iain) Fisher at Arthur.Fisher@cpuc.ca.gov with any questions regarding these comments.

Sincerely,

/s/ Arthur Fisher
Arthur (Iain) Fisher, PhD
Supervisor, Safety Analysis

cc: vcm_ceqa@aspenerg.com
Service List A.23-08-019



Ventura Compressor Station Modernization Project

From: Hess, Philip <philip.hess@ventura.org>
Sent: Wednesday, April 30, 2025 4:58 PM
To: john.forsythe@cpuc.ca.gov; Ventura Compressor Station Modernization Project
Cc: Nicole Collazo; Su, Yunsheng; Song, Jonathan; CEQA; Engstrom, Aaron; Webber, Brittany; Sproul, Griffin; Cagley, Corina
Subject: Comments on "Ventura Compressor Station Modernization Project" (RMA 25-006)
Attachments: RMA 25-006_APCD.pdf; RMA 25-006_WatershedProtection.pdf; RMA 25-006 _Planning&Fire.pdf

Hello,

Attached to this e-mail are the following comments regarding the proposed project.

- VC Air Pollution Control District
- VC Planning and Fire
- VC Public Works- Watershed Protection

Please feel free to contact me with any questions regarding this submission. Responses to these comments should be sent directly to the commenter with a copy to me.

Cheers,

~ Philip Hess

Philip Hess

Planning Programs Technician, EDR Coordinator
philip.hess@ventura.org



Ventura County Resource Management Agency | Planning Division

P. (805) 654-2443

800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740

Visit the Planning Division website at vcrma.org/planning



ALI REZA GHASEMI, PE
Air Pollution Control Officer

4567 Telephone Road, 2nd Floor | Ventura, CA 93003
Phone: 805.303.4005 | Fax: 805.456.7797

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: John E. Forsythe, Project Manager

DATE: April 30, 2025

FROM: Nicole Collazo, Air Quality Specialist, Planning Division *NC*

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for Ventura Compressor Modernization Project (RMA 25-006)

Ventura County Air Pollution Control District (APCD) staff has reviewed the subject Notice of Preparation (NOP) for the draft environmental impact report (DEIR), which will analyze the environmental impacts of construction and modernization of the Ventura Compressor Station by replacing its compressors with new units, construction of a new compressor and office buildings, a new warehouse, perimeter wall, and other ancillary site improvements. The project location is 1555 North Olive Street in the City of Ventura. The Lead Agency is the California Public Utilities Commission (CPUC).

APCD has the following comments regarding the project's NOP.

NOP Comments

1) The air quality assessment portion of the DEIR should consider project consistency, as included in the Ventura County Air Quality Assessment Guidelines (AQAG), with the recently adopted 2022 Air Quality Management Plan (AQMP). The 2022 AQMP is the air plan to attain the 2015 federal 8-hr ozone standard with updated emission factors and population forecasts. The 2016 AQMP was the plan to attain the 2008 federal ozone standard; that standard has been met. More information on the 2022 AQMP can be found here <https://www.vcapcd.org/2022-plan/>. The population consistency should compare the City of Ventura's existing population with the next population growth forecast found in the SCAG Connect SoCal plan against the proposed project's expected population growth. More on methodology for project AQMP consistency is found in Chapter 4 of the AQAG.

2) The AQAG can also be used to evaluate all potential air quality impacts. The AQAG are also downloadable from our website here: <https://www.vcapcd.org/wp-content/uploads/pubs/Planning/VCAQGuidelines.pdf>. Specifically, the air quality assessment should consider reactive organic compound (ROC) and nitrogen oxide (NOx) emissions from all

mobile sources, energy emissions such as heating, lighting and electricity, and area emissions such as landscaping equipment and maintenance. We note that the AQAG has not been updated recently and the recommended list of mitigation measures in the AQAG may be outdated. Current air quality determinations follow the same methodology but using different tools (CalEEMod vs. URBEMIS). A reminder about the off-site TDM Fund mitigation option, this may be proposed *after* all on-site feasible mitigation has been proposed (AQAG, Page 7-12), such as installing bicycle lockers, EV charging stations, energy standards exceeding Title 24, swapping out 1 proposed natural gas engine with an electric one, etc.

3) It is important to quantify construction emissions, although they are temporary and short-term in nature and not included in the impact determination for attaining the ambient air quality standards for ozone. A construction-based Health Risk Assessment (HRA) or screening should be conducted for construction activities that will occur for more than 6 months. OEHHA has guidance that includes modelling for the 0–2-year lifetime for infant exposure to toxic air contaminants. Emission reduction measures or Best Management Practices (BMPs) such as requiring Tier 4 off-road construction equipment can reduce pollutants by up to 85% and is highly recommended if construction emissions are above 25 lbs./day of ROC or NO_x. Using low-VOC paints may also reduce ROC emissions once construction estimates are known. Other emissions reduction measures include requiring 2010 and newer on-road engine vehicles for exporting material, in line with the California State Regulation for In-Use On-Road Diesel Vehicles Title 13, CCR §202 for fleet mixes.

4) APCD recommends that the project require the proposed 2- 2500 HP electric compressor engines to be the primary engines for use at the facility and the 2- 1900 HP natural gas engines proposed as the secondary engines to use only if absolutely necessary, such as during emergencies or during maintenance of the primary electric compressors. This is different from the Supplemental Electric-Driven Compressor Installation Only Alternative proposal under the Alternatives section of the DEIR and recommended as part of the proposed project operational design. Enforcement of this requirement can occur through the APCD Permit to Operate through new permit conditions that could include non-resettable hour meters, hour usage reporting, maximum allowable through the natural gas engines, etc.

5) The facility has an existing APCD Permit to Operate. An Authority to Construct application and issuance will be required prior to installation of replacement engines (replacing 3 – 1100 HP NG Engines on permit with 2 – 1900 HP NG Engines). In addition, below are specific requirements that will be imposed during the Authority to Construct process.

- Proposed engines must comply with BACT per Rule 26.2.A, *New Source Review*
- Offsets may be required per Rule 26.2.B, *New Source Review*
- Authority to Construct application process will require a school public notice pursuant to California Health & Safety Code Section 42301.6
- Engines will be subject to APCD Rule 74.9, *Stationary Internal Combustion Engines*, Federal Regulations 40 CFR Part 60 (*New Source Performance Standards, NSPS*) Subpart JJJJ *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

and 40 CFR Part 63 (*National Emissions Standards for Hazardous Air Pollutants, NESHAP*) Subpart ZZZZ *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, RICE*.

6) If the odor impact analysis of the project determines a significant air quality impact to sensitive receptors near the project site, on-site mitigation measures can include perimeter continuous air sampling and monitoring of mercaptan and other indicators of natural gas, increased frequency in component inspections, additional pressure alarm systems, installation of carbon scrubbers or other odor control technology, and/or other on-site odor mitigation proposed.

Thank you for the opportunity to comment on the NOP. If you have any questions, you may contact me at nicole@vcapcd.org.

**COUNTY of VENTURA**

RESOURCE MANAGEMENT AGENCY
DAVE WARD
Planning Director

SUSAN CURTIS
Assistant Planning Director

April 30, 2025

John E. Forsythe
Project Manager for the
Ventura Compressor Modernization Project
CPUC Energy Division, CEQA and Energy Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND
NOTICE OF PUBLIC SCOPING MEETING FOR THE VENTURA COMPRESSOR
MODERNIZATION PROJECT (CPCN APPLICATION NO. A.23-08-019) (RMA25 -
006)**

Dear John E. Forsythe:

Thank you for the February 28, 2025 letter informing the County of Ventura of the Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the SoCalGas Ventura Compressor Modernization Project CPCN Application No. A.23-08-019 (Proposed Project). The Proposed Project site is 1555 North Olive Street in the City of Ventura. The County Planning Division has reviewed the letter and associated materials that are available on the California Public Utilities Commission (CPUC) project website.

Project Description

The Proposed Project involves replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors with two new 1,900 HP natural gas compressors that meet Best Available Control Technology (BACT) standards and two new 2,500 nominal HP (estimated horsepower) electric-motor-driven compressors (electric compressors). These modifications would expand the use of an existing 8.4-acre site from three to four compressors and result in the establishment of a "hybrid" compressor station. Additionally, the proposed scope includes erecting a new 10,458 square-foot compressor building, a new 4,641 square-foot permanent office building, and a new 5,459 square-foot warehouse (totaling in 20,558 square-feet). The existing compressor equipment and temporary office facilities would be decommissioned approximately one year after the new facility has become operational. Finally, the Proposed Project includes the replacement of existing west and south combination chain-link fence/block wall with a new 8-foot-tall block wall as well as implementing other ancillary site improvements such as piping interconnection and storage tanks.

County General Plan

Through the 2040 Ventura County General Plan Visioning process, community members collaborated to create a shared vision for the future. Together they identified environmental justice as a guiding principle for the long-range document and adopted the following language to "Commit to the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies, protect disadvantaged communities from a disproportionate burden posed by toxic

HALL OF ADMINISTRATION #1740

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Ventura Compressor Modernization Project NOP Comments

April 30, 2025

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exposure and risk, and continue to promote civil engagement in the public decision-making process.” Furthermore, General Plan Policy LU-17.2 states the County shall “consider environmental justice issues as they relate to potential health impacts associated with land use decisions to reduce the adverse health effects of hazardous materials, industrial activities, and other uses that may negatively impact health or quality of life for affected county residents.”

The Proposed Project has resulted in comments regarding environmental justice from the City of Ventura's westside community. The State CalEnviroScreen tool shows the area surrounding the Proposed Project site in the City of Ventura experiences a pollution burden that is 87% higher than all other communities in the State of California.¹ In 2021 it was estimated there are approximately 2,563 residential units with approximately 6,407 residents living in a half mile radius of the Proposed Project site.² The Proposed Project site is also across the street from E.P. Foster Elementary School which carries an enrollment of 308 students; of which 90.3% are Hispanic or Latino and 37% of whom are English language learners.³

In 2023 the Ventura County Board of Supervisors approved a General Plan amendment to formally establish portions of unincorporated North Ventura Avenue as a Designated Disadvantaged Community (DDC). The southernmost portion of that community is approximately 1.6 miles away from the Proposed Project. North Ventura Avenue County residents enrolled in public school attend elementary and middle schools that are less than 1/3 of a mile away from the Proposed Project site. Two more schools, five day cares, and four public parks are located within a mile of the project site. Both the City, as described through their public comments, and the County General Plan direct for coordination with other agencies regarding the planning, siting, and design of potentially hazardous facilities near vulnerable populations. This letter describes a request for SoCalGas to more thoroughly consider in the EIR the alternate site near Devil's Canyon Road.

Environmental Impact Report Scoping

The EIR should carefully evaluate two scenarios for the Devil's Canyon alternate site and hazardous material impacts on schools near the Proposed Project site as described further below.

Alternatives Analysis

In 2022 the County Planning Division submitted a letter in response to the SoCalGas Feasibility Study of Potential Alternatives Ventura Compressor Station Modernization Project which clarified that the County's existing General Plan, Zoning Ordinance and the SOAR measure could allow the development of public utilities at the Devil's Canyon Road alternate site. The feasibility study was subsequently revised to include an October 2022 supplement to Appendix A, Dudek Environmental Technical Report and the Table 5 scoring rubric for the environmentally superior alternative was adjusted (see Attachment A below). This effort by SoCalGas was appreciated by the County Planning Division. Ultimately, the Devil's Canyon alternate site was identified as the highest scoring alternative and was therefore the environmentally superior location per the established criteria which were categorized into operational, on-site construction, and off-site construction for utilities considerations. This Feasibility Study/Appendix

¹ This data comes from CalEnviroScreen which is online mapping software developed by the State of California's Office of Environmental Health and Hazard Assessment (OEHA).

² This information comes from a letter then Mayor of the City of San Buenaventura Mayor Sofia Rubalcava sent to Governor Newsom on July 20, 2021.

³ These data come from the California Department of Education's online data portal Data Quest. [External link to Enrollment by Ethnicity 2023-2024](#). [External link to E.P. Foster Elementary School Profile](#)

Ventura Compressor Modernization Project NOP Comments

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A does not appear to be included in the Preliminary Environmental Assessment (PEA) made available for public review.

The EIR should include this previous assessment in the analysis of the Devil's Canyon alternate site. The scope of this analysis should include two scenarios:

- First, include an environmental review for the Devil's Canyon alternate site that includes the same development as described for the Proposed Project site.
- Second, investigate a new hybrid alternative in which the 10,458 square-foot compressors building and supportive utility equipment are moved to and built at the Devil's Canyon site, but the new 4,641 square-foot permanent office building, and a new 5,459 square-foot warehouse portion of the Proposed Project is built on the North Olive Street site. In this alternative SoCalGas staff could continue to operate out of and expand their current offices located on the Proposed Project site, while locating the hazardous equipment out of the urbanized area.

Hazardous Materials

According to the PEA, there are periodic (almost monthly) unplanned releases of gas.⁴ Natural gas is heavier than air and settles into the surrounding areas, including nearby residential and schools uses. The EIR should evaluate and mitigate potentially significant impacts to the school in accordance with CEQA checklist guidelines for hazardous materials and particularly with regards to Section VIII, subsection c. "Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?" The EIR should include analysis of the potential for unplanned releases of gas leaks and the following mitigation measure should be included:

Prior to approval of the Proposed Project the applicant shall provide to the CPUC a public-reviewed hazardous materials plan for gas compressor operation that addresses the risks associated with compressed gases, including potential fires, explosions, and toxic gas exposures. It should also outline procedures for safe storage, handling, and transportation of compressed gas cylinders and include measures to protect the surrounding community in the event of potential fires, explosions, and toxic gas exposures.

The EIR should also describe in the Devil's Canyon alternative site analysis that there would be less impacts to schools since the site is more than a quarter mile away from schools and therefore would not present an impact for this CEQA item.

Additionally, the EIR should provide a detailed remediation plan of the Proposed Project site for hazardous wastes and substances as identified in the PEA per California Government Code Section 65962.5 (Cortese List).

Environmental Justice and Social Equity

CPUC General Order 177 Section VI A 7 requires the applicant to submit information that explains how the Proposed Project would be consistent with the goals of CPUC's Environmental & Social Justice Action Plan and discuss whether it would be possible to relocate the Proposed Project outside of vulnerable areas. An analysis demonstrating how the Proposed Project is

⁴ Per page 345 of the PEA "Based on CARB's Oil and Gas reports, Ventura Compressor Station recorded 24 leaks from components in fugitive service in 2021 and 17 in 2022."

Ventura Compressor Modernization Project NOP Comments

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consistent with the CPUC's Environmental & Social Justice Action Plan is missing from the Certificate of Public Convenience and Necessity (CPCN) application before the Commission and the materials presented thus far for the EIR. The Notice of Preparation letter shared by your office on behalf of the applicant states this information will be excluded from the EIR but will be disclosed to the CPUC. The County of Ventura Planning Division respectfully requests to be notified when this information is available, that it include an analysis of alternative sites, and that the County is notified prior to, and be afforded the opportunity to comment on the information presented to the CPUC.

The map shown in Figure 1 below shows the Proposed Project site and the alternative sites in proximity to County's DDCs. While the Proposed Project site is further away from the County's DDCs, the Devil's Canyon site is more than a ½ mile away from the nearest DDC in an unurbanized area zoned for Open Space.

Figure 1. Area map that shows the approximate distance between the Proposed Site and the existing County Designated Disadvantaged Community (DDC) along North Ventura Avenue. Similar measurement is provided for the Devil's Canyon Alternative.



Ventura Compressor Modernization Project NOP Comments

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Alternative Site at Devil's Canyon

CPUC preemption may be applicable for certain local discretionary review processes.⁵ Should preemption not apply in the case of the Proposed Project, the County's General Plan, and Non-Coastal Zoning Ordinance (NCZO) allow the establishment of public utilities in the Open Space (OS) zone. Table 1 below shows an excerpt from NCZO Sec. 8105-4, which demonstrates there is a permitting pathway for a utility facility similar to the Proposed Project at the Devil's Canyon alternative site.

Table 1. Excerpt from Ventura County Non-Coastal Zoning Ordinance Sec. 8105-4

	OS-REC	OS	AE	RA	RE	RO	R1	R2	RPD	RHD	TP	TRU
PUBLIC SERVICE/UTILITY FACILITIES (27)												
<i>Small Utility Structures (17)</i>	E	E	E	E	E	E	E	E	E		E	
Excluding Office And Service Yards (28)	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP			
Public Service/Utility Offices And Service Yards, When Located On Lots Containing The Majority Of The Agency's Facilities (28)		CUP			CUP							

Fire Department Preliminary Review

The County Fire Department conducted a preliminary review of the alternative project sites located within the County's jurisdiction which include Devil's Canyon, Avocado, and Steel alternative sites. This preliminary review is included as Attachment B and the generally states the alternative sites could be permitted with a fire protection plan and other site improvements such as water supply and access improvements per the County Fire Code.

Closing

Thank you again for the opportunity to comment on the NOP. The Proposed Project involves the expansion of an industrial facility in an urbanized setting with numerous sensitive receptors nearby. We understand the need to expand facilities as energy needs and technologies change. Given the potential expansion of the operations in the State recognized DDC, the siting of this gas compressor expansion is a crucial moment for SoCalGas, the CPUC, and local government agencies to coordinate their planning efforts and use their respective capacities to further environmental and social justice.

⁵ California Public Utilities Commission (CPUC) General Order (GO) 177, Section VII.B. and § 4.70.030 Permit exemption for utility companies

Ventura Compressor Modernization Project NOP Comments

April 30, 2025

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Through a full evaluation of project alternatives, meaningfully incorporating community input, and accurately acknowledging disproportionate environmental impacts your commission may begin a process to move potentially hazardous operations to less urbanized areas for community benefit and land use compatibility. If you have any questions about general comments, please contact lead staff person, Area Plans and Resources Section Planning Manager Aaron Engstrom, at Aaron.Engstrom@ventura.org or (805) 654-2936.

Sincerely,



Dave Ward, AICP
Planning Director

CC: Supervisor Matt Laverie, Ventura County Board of Supervisors, District 1

Attachment A: Supplement Appendix A Environmental Scoring Rubric Table 5 and Alternative Ranking Based on Environmental Scoring Rubric Table 50

Attachment B: Ventura County Fire Department Preliminary Review Memorandum

Ventura Compressor Modernization Project NOP Comments

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Attachment A: Supplement Appendix A Environmental Scoring Rubric Table 5 and Alternative Ranking Based on Environmental Scoring Rubric Table 50**Table 5. Environmental Scoring Rubric**

Topic Areas	Existing Site		Avocado Site		Ventura Steel Site		Devil's Canyon Road Site		County Line Site	
	Natural Gas	Hybrid	Natural Gas	Hybrid	Natural Gas	Hybrid	Natural Gas	Hybrid	Natural Gas	Hybrid
Operational Considerations										
Aesthetics/Visual	8	8	0	0	6	5	8	7	0	0
Air Quality	1	5	1	5	1	5	1	5	0	5
CalEnviroScreen	1	1	2	2	3	3	2	2	2	2
Greenhouse Gas Emissions	3	5	3	5	3	5	3	5	2	4
Land Use Designation	1	1	6	6	9	9	6	6	6	6
Noise	4	4	9	9	7	8	8	9	4	6
Wildfire	8	8	2	1	0	0	2	1	3	2
Subtotal	26	32	23	28	29	35	37	35	17	25
Subtotal (*10)	260	320	230	280	290	350	300-320	250-370	170	250
On-Site Construction Considerations										
Air Quality	6	6	0	0	6	6	6	6	2	2
Cultural Resources	8	8	6	6	7	7	7	7	8	8
Greenhouse Gas Emissions	8	8	2	2	8	8	8	8	4	4
Natural Resources	9	9	8	8	9	9	4	4	6	6
Noise	3	3	9	9	9	9	9	9	7	7
Slope, Topo, and Grading	8	8	0	0	8	8	8	8	3	3
Traffic - Construction	6	6	7	7	9	9	9	9	2	2
Subtotal	48	48	32	32	56	56	51	51	32	32

Table 5. Environmental Scoring Rubric

Topic Areas	Existing Site		Avocado Site		Ventura Steel Site		Devil's Canyon Road Site		County Line Site	
	Natural Gas	Hybrid	Natural Gas	Hybrid	Natural Gas	Hybrid	Natural Gas	Hybrid	Natural Gas	Hybrid
Off-Site Construction for Routing Utilities Considerations										
Air Quality	9	9	2	0	0	0	5	3	5	4
Cultural Resources	8	8	6	6	8	8	6	7	7	6
Greenhouse Gas Emissions	9	9	7	6	4	4	7	7	9	9
Natural Resources	8	8	0	0	0	0	0	0	8	8
Noise	9	9	9	9	0	0	9	9	0	0
Traffic-Roadway Construction	9	9	7	7	0	0	7	7	7	7
Utilities/Service Systems	9	9	4	4	1	1	3	3	4	4
Subtotal	61	61	35	32	13	13	37	35-36*	39-40*	38
Total Environmental Score	369	429	297	344	359	419	389-408	437-457	244-242*	320

* Note the changes in these values are due to errors in tabulation and do not reflect a change in the original scoring of the topic areas.

Ventura Compressor Modernization Project NOP Comments

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□ Section 5.6 – Ranking of Alternatives, Pages 116 and 117:

Upon completion of the rubric scoring, the final tallies for each of the alternative sites and technology options were compared. The final scoring range for the alternatives is shown in Table 50.

Table 50. Alternative Ranking Based on the Environmental Scoring Rubric

Alternative Sites	Technology Options	Operational Considerations Ranking (×10)	On-Site Construction Considerations Ranking	Off-Site Construction for Utilities Considerations	Total Score
Option 4: Devil's Canyon Road Site	B. Hybrid	350-370	51	35-36*	437-457
Option 1: Existing Site	B. Hybrid	320	48	61	429
Option 3: Ventura Steel Site	B. Hybrid	350	56	13	419
Option 4: Devil's Canyon Road Site	A. Natural Gas	300-320	51	37	389-408
Option 1: Existing Site (Planned Project)	A. Natural Gas	260	48	61	369
Option 3: Ventura Steel Site	A. Natural Gas	290	56	13	359
Option 2: Avocado Site	B. Hybrid	280	32	32	344
Option 5: County Line Site	B. Hybrid	250	32	38	320
Option 2: Avocado Site	A. Natural Gas	230	32	35	297
Option 5: County Line Site	A. Natural Gas	170	32	39-40*	241-242*

* Note the changes in these values are due to errors in tabulation and do not reflect a change in the original scoring of the topic areas.

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Ventura Compressor Modernization Project NOP Comments

April 30, 2025

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Attachment B: Ventura County Fire Department Preliminary Review Memorandum


**VENTURA COUNTY
FIRE DEPARTMENT**

Fire Prevention Bureau
2400 Conejo Spectrum St. Thousand Oaks, CA 91320
Office (805) 389-9738
fireprevention@ventura.org

MEMORANDUM

DATE: 4/23/2025

TO: Philip Hess

FROM: Corina Cagley, Fire Prevention Officer

PROJECT NUMBER: RMA 25-006

APPLICANT: California Public Utilities Commission

LOCATION: 1555 North Olive Street, City of Ventura

DESCRIPTION: The Proposed Project would modernize the Ventura Compressor Station, located at 1555 North Olive Street in the City of Ventura. The scope of the Proposed Project includes:

- (1) replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the-art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal HP (estimated horsepower), electric-motor-driven compressors (electric compressors), with zero nitrogen oxide (NOx) emissions, resulting in a "hybrid" compressor station;
- (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 to replace the existing west and south chain-link fence/block wall; and
- (6) implementing other ancillary site improvements, such as piping interconnection and storage tanks.

Application Complete - This project has been reviewed by the Ventura County Fire Protection District and is found to **have no comments/conditions**.

Alternative Sites: The following comments and conditions for: Devils Canyon, Avocado and Ventura Steel. Please note these are preliminary comments as there are no formal site plans or applications submitted for a county permit. Therefore, this analysis may be subject to change.

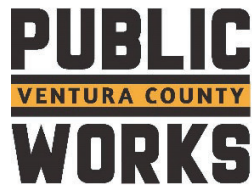
- **State Fire Safe Regulations-LRA** - The project is located within a Local Responsibility Area (LRA) Very High Fire Severity Zone (VHFHSZ) and shall comply with the minimum standards of the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Article 6, Subchapter 2, "SRA/VHFHSZ Fire Safe Regulations" (CCR T-14 FSR), unless modified by more restrictive local ordinances and requirements.

Ventura Compressor Modernization Project NOP Comments

April 30, 2025

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- **Hazardous Fire Area-** This project is located in a Hazardous Fire Area and all structures shall meet hazardous fire area building code requirements. Contact the Building Department regarding requirements. (Ventura Steel)
- **Fuel Modification Zone and Landscape Plans -** The developer shall provide Fuel Modification Zone (FMZ) and or Landscape plans prepared by a licensed landscape architect to VCFD for review and approval as follows. A Fuel Modification Zone Covenant and Agreement shall be recorded on the parcel(s) prior to final acceptance inspection by the Fire Prevention Bureau.
- **Fire Protection Plan-** The developer shall submit a Fire Protection Plan to the Fire Prevention Bureau for review and approval prior to construction of the project. The contents of the Fire Protection Plan shall be described in the current Ventura County Fire Code. A preliminary fire protection plan shall be submitted for review and approval prior to approval of any proposed project subject to a discretionary review by Ventura County Planning Department.
- **Access Road Width, Private Roads-** Private roads shall comply with Public Road Standards, unless modified by the Fire Department with City approval. An onsite access width of 24 feet and off-street parking shall be provided.
- **Turning Radius within FHSZ-** The access road shall be of sufficient width to allow for a 50 foot inside turning radius at all turns in the road. (Avocado)
- **Private Water Supply -** A private water supply shall be installed in accordance with current Fire District requirements. This project will require a water storage tank.
- **Fire Flow (Commercial, Industrial)-** The minimum fire flow required shall be determined as specified by the current adopted edition of the Ventura County Fire Code Appendix B with adopted Amendments and the applicable Water Manual for the jurisdiction (with ever is more restrictive).
- **Fire Sprinklers-** All structures shall be provided with an automatic fire sprinkler system in accordance with current VCFPD Ordinance at time of building permit application.
- **Fire Alarm System-** A fire alarm system shall be installed in all buildings in accordance with California Building and Fire Code requirements.
- **Fire Code Permits-** Applicant and / or tenant shall obtain all applicable Fire Code (IFC) permits prior to occupancy or use of any system or item requiring an IFC permit.
- **Fire Department Clearance-** Applicant shall obtain VCFD Form #610 "Requirements for Construction" prior to obtaining a building permit for any new structures or additions to existing structures.



WATERSHED PROTECTION
 WATERSHED PLANNING AND PERMITS DIVISION
 800 South Victoria Avenue, Ventura, California 93009

MEMORANDUM

DATE: April 9, 2025

TO: Griffin Sproul, Case Planner
County of Ventura

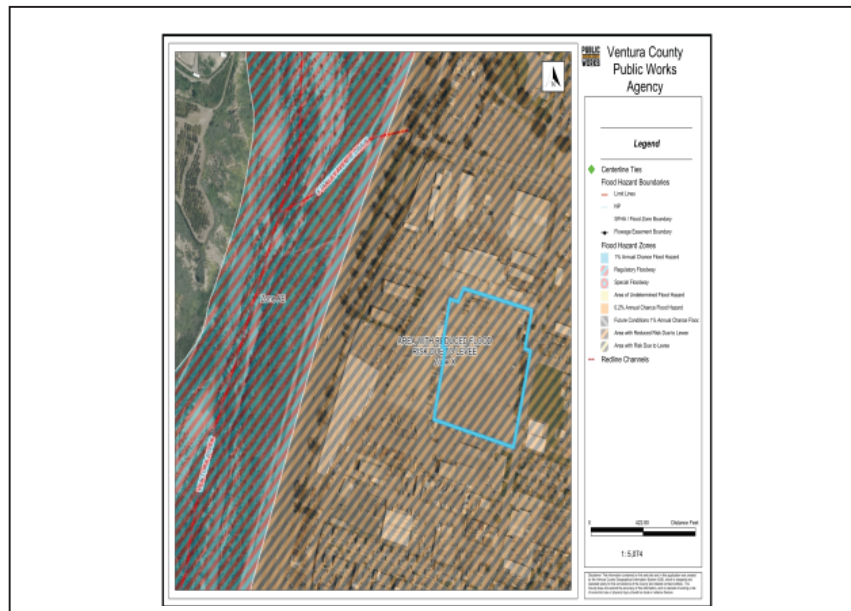
FROM: Yunsheng Su, PWA-WP Case Reviewer

SUBJECT: 2025021225 1555 North Olive Street, Ventura, ca,
APN:068014203
CEQA Review Comments and Conditions

Pursuant to your request dated 4/7/2025, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

1555 North Olive Street, Ventura, ca,
Location Map:



2025021225 1555 North Olive Street, Ventura, ca,
April 9, 2025
Page 2 of 3

PROJECT DESCRIPTION:

The Proposed Project would modernize the Ventura Compressor Station, located at 1555 North Olive Street in the City of Ventura. The scope of the Proposed Project includes: (1) replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal HP (estimated horsepower), electric-motor-driven compressors (electric compressors), with zero nitrogen oxide (NOx) emissions, resulting in a “hybrid” compressor station; (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 to replace the existing west and south chain-link fence/block wall; and (6) implementing other ancillary site improvements, such as piping interconnection and storage tanks. The existing compressor equipment and temporary office facilities would be decommissioned approximately one year after the new facility has become fully operational.

APPLICATION COMPLETENESS:

Complete - from our area of concern.

ENVIRONMENTAL IMPACT ANALYSIS:

Item 31a. Flood Control Facilities/Watercourses – Ventura County Public Works Agency, Watershed Protection is deemed to be Less Than Significant.

The proposed project is situated about 900 feet from the Stanley Avenue Drain, which is a WP jurisdictional redline channel. No new or modified direct stormwater drainage connections to this WP channel, activities within WP’s easement, or activities over, under, or within the redline channel appear to be proposed or indicated on the applicant’s submitted materials.

This proposed project would result in an increase of impervious area within the subject property. It is understood that impacts from the proposed increase in impervious area and stormwater drainage design within the project site will be required to be mitigated to less than significant under the conditions imposed by County of Ventura. The mitigation requires that runoff from the proposed project site be released at no greater than the existing flow rate and in such manner as to not cause an adverse impact downstream in peak discharge, velocity, or duration.

WP staff determines that the proposed project design with the conditions mentioned above mitigates the direct and indirect project-specific and cumulative impacts to flood control facilities and watercourses. Therefore, the environmental impact is less than significant (LS) on redline channels under the jurisdiction of the Ventura County Public Works Agency - Watershed Protection.

2025021225 1555 North Olive Street, Ventura, ca,
April 9, 2025
Page 3 of 3

WATERSHED PROTECTION COMMENTS:

None.

WATERSHED PROTECTION CONDITIONS:

None.

If you have any questions, please feel free to contact me by email at Yunsheng.Su@Ventura.Org or by phone at [805-654-2005](tel:805-654-2005).

END OF TEXT.

Ventura Compressor Station Modernization Project

From: Ada Statler <astatler@earthjustice.org>
Sent: Thursday, March 6, 2025 12:52 PM
To: john.forsythe@cpuc.ca.gov
Cc: Matt Vespa; Ventura Compressor Station Modernization Project; Kristian Nunez; Haley Ehlers; Alison Huyett; Rebecca Davis; Kevin P. Bundy
Subject: RE: Ventura Compressor Station Scoping Meeting Date and Format

Hi John,

After speaking again with our client, CAUSE, as well as other community members who wish to attend the scoping meeting but would benefit from greater time to prepare since this proceeding has been dormant for so long, we continue to request a more accessible meeting at a later date and with an in-person option in Ventura (for example, at EP Foster Elementary School across the street from the proposed project site).

However, if the meeting is to be held as originally proposed for March 11th, we would like to know if a Spanish interpreter will be joining, and whether/how the public will be able to provide oral comments on the Zoom.

Thank you,
Ada Statler

Senior Associate Attorney
Earthjustice Clean Energy Program
50 California Street, Suite 500
San Francisco, CA 94111
C: 913-945-0214



From: Rebecca Davis <rebecca@lozeaudrury.com>
Sent: Tuesday, March 4, 2025 10:47 AM
To: Kevin P. Bundy <Bundy@smwlaw.com>
Cc: Matt Vespa <mvespa@earthjustice.org>; john.forsythe@cpuc.ca.gov; vcm_ceqa@aspeneg.com; Ada Statler <astatler@earthjustice.org>; Haley Ehlers <haley@cfrog.org>; Kristian Nunez <kristian@causenow.org>; Alison Huyett <Alison.Huyett@patagonia.com>
Subject: Re: Ventura Compressor Station Scoping Meeting Date and Format

John,

On behalf of Patagonia, we are also requesting additional time and accessibility options during the scoping process to align with the ESJ action plan and provide meaningful public participation. Specifically, we request the NOP be provided in both Spanish and English, additional time be provided

before a scoping meeting is held, and an in-person option in Ventura be available for community members impacted by the project.

Sincerely,
Rebecca Davis

Rebecca L. Davis
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612
Office: 510.836.4200
Direct: 510.230.0400
Mobile: 541.232.1331
rebecca@lozeaudrury.com

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On Mon, Mar 3, 2025 at 2:58 PM Kevin P. Bundy <Bundy@smwlaw.com> wrote:

John,

On behalf of Climate First: Replacing Oil and Gas (CFROG), I'd like to echo Matt's concerns about the lack of adequate notice of the scoping meeting, as well as his requests for additional time before the meeting, additional notice in Spanish and English, and an in-person attendance option in the affected community.

Thank you for your consideration.

Best,

Kevin Bundy

Kevin P. Bundy
Partner
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421
p: 415/552-7272 x209 | he/him/his



www.smwlaw.com | A San Francisco Green Business

From: Matt Vespa <mvespa@earthjustice.org>
Sent: Monday, March 3, 2025 2:04 PM
To: john.forsythe@cpuc.ca.gov; vcm_ceqa@aspeneg.com
Cc: Kevin P. Bundy <Bundy@smwlaw.com>; Ada Statler <astatler@earthjustice.org>;
rebecca@lozeaudrury.com; Haley Ehlers <haley@cfrog.org>; Kristian Nunez <kristian@causenow.org>
Subject: Ventura Compressor Station Scoping Meeting Date and Format

Hi John,

I received the NOP for the Ventura Compressor Station EIR on Friday afternoon. On behalf of the Central Coast Alliance for a Sustainable Economy (“CAUSE”), I want to register my serious concerns with both the lack of sufficient notice and the lack of accessibility for the March 11th virtual Scoping Meeting. Enhancing outreach and public participation opportunities for ESJ communities is a key goal of the Commission’s ESJ Action Plan. This goal is not achieved where, as here, the PUC issues an NOP that is only in English, provides only slightly over a week’s notice for a Scoping Meeting, and only provides an on-line option for attendance. As you may know, there are significant community concerns with this project, particularly given its location directly across from an elementary school. For the CEQA process to be meaningful and outreach to conform with the ESJ Action Plan, the community needs more notice for a meeting, notice in both Spanish and English, and an in-person attendance option.

I would appreciate if you could let me know a time this week to discuss these concerns further. I am hopeful we can arrive at a solution that meets community needs and the Commission’s commitments under the ESJ Action Plan.

Thank you

Matt

cc:ing representatives for CAUSE, CFOG, and Patagonia.

Matthew Vespa
(he/him)
Senior Attorney
50 California Street, Suite 500
San Francisco, CA 94111
Office: (415) 217-2123
Cell: (415) 310-1549
[🐦@missionvespa.bsky.social](https://twitter.com/missionvespa)



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Ventura Compressor Station Modernization Project

From: Brooke Balthaser <brooke@cfrog.org>
Sent: Monday, March 17, 2025 1:07 PM
To: Ventura Compressor Station Modernization Project
Subject: Add to mail list for Ventura Compressor Modernization Project + written comment
Attachments: Comment for Ventura Compressor Modernization Project.pdf

Hello,

I hope this email finds you well. I am reaching out because I would like to be added to the vcm_ceqa@aspenerg.com email list to receive updates, environmental documents, and notices related to SoCalGas' Ventura Compressor Modernization Project.

I would also like to submit a written comment for this scoping period. Please find my comment attached below as a PDF, and let me know if you have any questions or trouble opening the file. Thank you.

Best,
Brooke Balthaser

--

Brooke Balthaser (she/her)
Community Organizing Manager
CFROG - Climate First: Replacing Oil & Gas
(805)243-8088 | brooke@cfrog.org
www.cfrog.org

March 17, 2025

To: John E. Forsythe, CPUC

Subject: Ventura Compressor Modernization Project

Hello Mr. Forsythe and Commissioners,

My name is Brooke Balthaser and I am the Community Organizing Manager at CFROG, or Climate First: Replacing Oil & Gas. CFROG is a Ventura County-based advocacy organization leading a just transition away from fossil fuels to protect our health, economy and climate.

In my role as community organizing manager, I'd like to thank the commission for holding a virtual scoping meeting, as the value of allowing the community to share their feedback and priorities regarding this issue cannot be overstated. That being said, I hope to see more opportunities for the community to engage in this public hearing process, particularly in an in-person setting, at a time and place that is convenient for working families, and includes language accessibility. I also ask that we be notified of any future in-person meetings at least 15 days in advance, and that any and all material related to these meetings are available in both English and Spanish.

I would also like to strongly urge the commission to study the significant public safety and air quality concerns in the Environmental Impact Report for this proposed expansion on the Ventura Compressor Station. In regards to public safety, there is a reason why compressor stations are generally situated away from sensitive sites, and that is the risk of explosion. Our vibrant community in West Ventura did not consent to living in an incineration zone, and this proposed expansion would put an even wider population at risk if an explosion were to ever happen. To make matters worse, SoCalGas is the same operator responsible for the 2015 Aliso Canyon Disaster – the largest gas blowout in the history of the United States. With this in mind, SoCalGas cannot be trusted to responsibly operate this facility, let alone one that was doubled in size.

In the case of air quality concerns and impacts to public health, this proposed expansion would double the pollution that our community has to face each and every day. In 2017, NASA identified this compressor station as a super emitter of methane – a pollutant that has significant negative impacts on public health. Now, imagine you're a parent of a student attending E.P. Foster Elementary School – Would you send your child to school every day knowing that the facility next door was a super emitter of methane and at risk of exploding? If your answer is no, I have to wonder why the commission is okay with making this a reality for hundreds of families.

With that being said, I would also like to urge the commission to prioritize studying alternative locations for this compressor station with less polluting designs. First, an alternative location would relieve the community from the risk of explosion and exposure to harmful pollutants. Building new polluting equipment in this community is an environmental justice harm and fails to uphold the CPUC's environmental and social justice commitments. This is an opportunity to relocate the project out of a disadvantaged community and remedy a legacy of pollution. Furthermore, The Commission needs to study electric and smaller compressors, and it shouldn't let SoCalGas limit the scope of CEQA review to avoid alternatives proposed by the community. The Commission should recognize that the oil and gas industry is in decline, and we have an opportunity to manage this decline in a way that fosters a just transition to clean energy sources while protecting frontline communities and workers.

Thank you,

Brooke Balthaser (she/her)

Community Organizing Manager

CFROG – [Climate First: Replacing Oil & Gas](#)

(805)243-8088 | brooke@cfrog.org

Ventura Compressor Station Modernization Project

From: John Brooks <johnbrooks69@gmail.com>
Sent: Thursday, March 27, 2025 1:56 PM
To: Ventura Compressor Station Modernization Project
Subject: Ventura Compressor

Dear Compassionate People,

Its mind numbing to see the CPUC which is supposedly committed to environmental justice, let the Gas company bamboozle you on this compressor.

Shut it down, move it across the river, whatever. Just don't make the low income largely Latino community suffer the pollution and risks from this industrial activity in a residential neighborhood.

We've marched, we've sent letters we have shown the will of the community.

Now its time for you to do the right thing.

John Brooks

Executive Director of the First Amendment Foundation Ventura County.

Ventura Compressor Station Modernization Project

From: Matt Vespa <mvespa@earthjustice.org>
Sent: Tuesday, April 8, 2025 3:55 PM
To: john.forsythe@cpuc.ca.gov; Ventura Compressor Station Modernization Project
Cc: Ada Waelder; Aaron M. Stanton; bundy@smwlaw.com; rebecca@lozeaudrury.com
Subject: Comments on NOP for Ventura Compressor Station
Attachments: CAUSE CFROG Patagonia Ventura Compressor Station NOP Comments 04 08 25.pdf

John –

Attached please find comments on the Notice of Preparation for the proposed expansion of the Ventura Compressor Station on behalf of CAUSE, CFROG and Patagonia.

Thank you and let me know if you have any questions.

Matt

Matthew Vespa
(he/him)
Senior Attorney
50 California Street, Suite 500
San Francisco, CA 94111
Office: (415) 217-2123
Cell: (415) 310-1549
[@missionvespa](https://twitter.com/missionvespa).bsky.social



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April 8, 2025

John E. Forsythe
Project Manager for the Ventura Compressor
Modernization Project
CPUC Energy Division, CEQA and Energy
Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Email: John.forsythe@cpuc.ca.gov;
Vcm_ceqa@aspeneg.com

Re: Ventura Compressor Modernization Project – Comments of
CAUSE, CFROG, and Patagonia on Notice of Preparation

Dear Mr. Forsythe:

On behalf of a coalition of organizations including Climate First: Replacing Oil & Gas (“CFROG”), Central Coast Alliance United for a Sustainable Economy (“CAUSE”), and Patagonia, Inc. (together, “Coalition”), thank you for the opportunity to comment on the Notice of Preparation (“NOP”) for the Ventura Compressor Modernization Project.

CFROG is a Ventura-based advocacy organization leading a just transition away from fossil fuels to protect our health, economy, and climate. CFROG advocates for positive changes that promote a fossil fuel-free future and works to combat environmental injustice and the profound impacts that environmental pollution has had and continues to have on communities of color.

CAUSE is an advocacy organization committed to social, economic, and environmental justice for working-class and immigrant communities in California’s Central Coast. CAUSE’s vision is to create a global community where we all contribute to, and benefit from, a sustainable economy that is just, prosperous, and environmentally healthy.

Patagonia is an outdoor clothing and gear company that has operated in California for nearly 50 years and employs more than 750 people at its headquarters in Ventura, California, where its

employees live, work, and recreate. Patagonia is also an activist company. Its mission is to “save our home planet,” and it publicly advocates for a world where everyone has access to clean air, water, land, and a healthy community. Patagonia understands that environmentalism and social justice are inextricably linked and works to address the intersection of people and planet, and the core inequities in society. Patagonia’s headquarters is located approximately one mile from SoCalGas’ Ventura Compressor Station.

For decades, applicant SoCalGas has operated the Ventura Compressor Station in the middle of a densely populated urban neighborhood, exposing generations of residents and children in a predominately minority community to toxic air pollutants, noise, and a risk of catastrophic explosion. Now, SoCalGas’s Project proposes to saddle this already over-burdened neighborhood—which ranks in the 83rd percentile in the state for exposure to various pollutants¹—with an even *larger* natural gas compressor station for the next fifty years. To avoid perpetuating this environmental injustice, the Commission must prepare an EIR that fairly and accurately analyzes the Project’s environmental impacts, as well as a full range of alternatives to the current Project, including alternative sites, electric compressor equipment, and the inclusion of reasonable non-pipeline solutions.

This letter describes the NOP’s specific flaws. Those flaws include an inadequate description of the Project and its objectives. The inadequate description of the objectives, combined with flaws in the objectives presented in the Project application, arbitrarily obscure and constrain the analysis of alternatives that should be studied in the EIR. As a result, the Commission must issue a new NOP with sufficient detail about the Project for further public review. In any event, the EIR must examine a range of reasonable alternatives to the Project, including non-pipeline alternatives, varied project sizes, and alternative sites. The Coalition also urges the Commission to fully analyze the Project’s potentially significant environmental impacts, including, but not limited to, air quality and greenhouse gas emissions impacts related to methane leaks, blowdown events, and normal operations of a compressor station; noise impacts; public health and safety risks related to the possibility of an explosion; and public health risks related to soil disturbance and valley fever.

I. The NOP lacks an adequate description of the Project.

The purpose of an NOP is to solicit guidance from agencies and the public as to the scope and content of the environmental information to be included in the EIR.² To effectively solicit such

¹ CalEnviroScreen 4.0, https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/CalEnviroScreen-4_0 (last accessed March 12, 2025).

² 14 Cal. Code Regs. § 15375.

guidance, the NOP must provide adequate and reliable information regarding the nature of the project.³

The NOP fails to meet this standard. In particular, the NOP does not define the Project's objectives. The lack of a description of objectives obscures why the applicant is pursuing the Project. Among other things, this opacity makes it impossible for the public to determine whether the Project is appropriately structured and sized to meet its objectives. Further, the lack of transparent objectives makes it impossible for the public to meaningfully comment on the range of alternatives that should be analyzed in the EIR.

To remedy these flaws, the Commission should reissue the NOP with an adequate description of the Project that includes the Project's objectives.

II. The Project's objectives should be re-defined to avoid artificially narrowing the scope of acceptable alternatives.

The consideration of feasible alternatives is at the "core" of environmental review under CEQA.⁴ "It is the policy of the state that public agencies should not approve projects as proposed if there are *feasible alternatives or feasible mitigation measures available* which would substantially lessen the significant environmental effects of such projects."⁵

While the NOP does not include a description of the Project's objectives, the description of the objectives in the Proponent's Environmental Assessment ("PEA") must be revised to avoid inappropriately distorting the EIR's analysis of project alternatives.⁶ For example, the objective to "[m]odernize the Ventura Compressor Station's aging infrastructure ... in support of year-round system reliability,"⁷ implies a bias in favor of maintaining the project at the current compressor station location. The objective should be re-worded so that it lacks this bias: e.g.: *support year-round system reliability with more efficient and less polluting solutions*. Likewise, the objective to "[r]educe permitted NOx emissions at the facility by installing new compressors equipped with state-of-the-art emissions control technology" is expressly biased in favor of installing new compressors and against non-pipeline alternatives. Instead, the objective should

³ See 14 Cal. Code Regs. § 15082.

⁴ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564; see Pub. Res. Code § 21001(g) (declaring the policy of the state to "consider alternatives to proposed actions affecting the environment").

⁵ *Citizens of Goleta Valley*, 52 Cal.3d at 565, quoting Pub. Res. Code § 21002.

⁶ See *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 668 ("[A] lead agency may not give a project's purpose an artificially narrow definition."); *We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683, 692 (project proponent may not define project objectives so narrowly as to effectively preclude an alternatives analysis; rejecting objectives that "ensured that the results of [the] alternatives analysis would be a foregone conclusion").

⁷ PEA at 2-13.

contain the goal of “reduc[ing] permitted NOx emissions” without dictating the means used to achieve that goal.⁸

Further, the objectives should be revised to avoid pre-determining the size of the Project prior to the Commission’s identification of the need for the Project in the CPCN process and comport with General Order 177’s emphasis on gas system planning and avoidance of stranded asset risk from new major capital investments in the gas system. For example, the objective to “[p]romote system reliability and affordability by restoring the capability of replenishing the entire La Goleta Storage Field inventory during the summer operating season,”⁹ pre-supposes that the Commission identifies a need for that capability and that level of storage capacity. The objective should be deleted or revised to state: *promote system reliability and affordability by ensuring adequate storage to serve system needs during the winter months when accounting for projected declines in gas demand over the project’s estimated useful life.*¹⁰

III. The EIR must examine a reasonable range of alternatives.

The EIR must evaluate a range of reasonable alternatives that can feasibly achieve most of the Project’s objectives while lessening or avoiding any of its significant impacts.¹¹ Potentially feasible alternatives must be considered even if they impede some of the project’s objectives or would be more costly.¹² If any alternatives are rejected as infeasible during the scoping process, the EIR must explain why.¹³ The EIR also must include sufficient information about each alternative to allow “meaningful evaluation, analysis, and comparison with the proposed project”; a “matrix displaying the major characteristics and significant environmental effects of each alternative” may be used for this purpose.¹⁴

The EIR also must examine alternative locations for the Project. “The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.”¹⁵ In addition, because the Project is being proposed in an Environmental and Social Justice (“ESJ”) Community, the EIR

⁸ See *North Coast Rivers Alliance*, 243 Cal.App.4th at 668-69.

⁹ PEA at 2-13.

¹⁰ See General Order 177 at Sec. VI(A)(1)(b), https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/general-orders/go_177_gas_infrastructure.pdf.

¹¹ CEQA Guidelines § 15126.6(a); see also, e.g., *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437.

¹² CEQA Guidelines § 15126.6(b).

¹³ *Id.*, § 15126.6(c).

¹⁴ *Id.*, § 15126.6(d).

¹⁵ *Id.*, § 15126.6(f)(2)(A).

should address GO 177's requirement that the discussion of alternatives include "whether it is possible to relocate the project and, if so, steps taken to locate the project outside such areas."¹⁶

First, the EIR should include an alternative that incorporates non-pipeline solutions, including increased electrification on top of already projected decreases in gas demand to further reduce the need and the size of the project. The PEA prepared by SoCalGas irrationally treats electrification as an all-or-nothing proposition, demanding that electrification replace "the average daily gas demand for 100% of core and non-core customers during the summer operating season ... to free sufficient capacity at the existing station to fill the La Goleta Storage Field."¹⁷ As SoCalGas acknowledges, to meet these targets, "the entirety of the North Coastal System would need all summer-season gas end-use"—by approximately 238,000 customers—"to be converted to electric."¹⁸ Not surprisingly, that artificial requirement led SoCalGas to conclude that electrification would be too expensive and otherwise infeasible.¹⁹ Moreover, the SoCalGas analysis assumed all costs to fully electrify all customers on the North Coastal system would be assumed by gas ratepayers.²⁰ In lieu of this approach, the EIR should evaluate whether added incentive funding to cover some of the costs of electrifying major gas appliances like space or water heating can more cost-effectively achieve gas demand reductions.

The Commission should not allow SoCalGas to define the non-pipeline alternative as necessitating an irrational requirement that makes it infeasible. Neither General Order 177 nor CEQA requires that a non-pipeline alternative replace the entire need for the project. Rather, a reasonable alternatives analysis would incorporate non-pipeline alternatives like electrification and other measures (e.g., imports from the PG&E system at Morro Bay) in *combination* with a project involving a smaller-scale infrastructure solution to address the identified need. The EIR should thus analyze an alternative that incorporates the maximum amount of electrification that is feasible to achieve in combination with other non-pipeline alternatives and a smaller-scale compressor station to address the remainder of the need. The Commission should further consider how the neighborhood decarbonization pilot programs described in Public Utilities Code section 663 could contribute to or be part of an electrification alternative.

In addition to evaluating the use of gas imports from PG&E's system in combination with electrification to reduce or eliminate the need for the compressor station, the EIR should also evaluate an alternative that expands PG&E's gas service territory to match its electric service territory. PG&E currently provides electric service to San Luis Obispo and northern Santa Barbara Counties while SoCalGas supplies these areas with gas. From a gas delivery standpoint, this alternative appears feasible given PG&E's receipt point to the North Coastal System at

¹⁶ General Order 177 at Sec. VI(4)(c).

¹⁷ PEA 4-4.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ CPCN Application at 79.

Morro Bay is currently able to supply up to 40 MMcfd to the region, more than half the average winter daily gas demand for the entire North Coastal System.²¹ In addition to substantially reducing, if not eliminating the need for compression in Ventura, this alternative would facilitate California's decarbonization objectives given both the willingness and ability of PG&E to execute zonal electrification projects as a provider of both gas and electric service.

The EIR's analysis of alternatives should also include a fully electric compressor station. The PEA dismisses these alternatives as infeasible due to its conclusion that they would require a new substation on-site or another form of back-up generation that would not fit within the project site.²² Yet electrical outage history at the compressor station has not exceeded more than a handful of hours per year and the PEA nowhere credibly explains how a brief outage would meaningfully compromise the Project's reliability objectives. Moreover, SoCalGas has admitted that 5,000 hp of electric compression capacity, well above the 3,300 hp of existing compressor capacity, could be installed without the need for major electric system upgrades.²³ In evaluating the feasibility of an all-electric alternative, the EIR should not parrot SoCalGas' unsubstantiated rationales for its rejection.

Again, the PEA imposes arbitrary constraints on these alternatives, including limiting their consideration to the existing project site rather than considering them on the alternative project sites. The PEA also refuses to consider these alternatives in combination with non-pipeline alternatives that could reduce the need for compression capacity. SoCalGas should not be allowed to artificially manipulate the alternatives analysis to render its disfavored alternatives infeasible in this manner. The EIR should consider as alternatives a smaller, fully electric compressor station in combination with non-pipeline alternatives and alternative locations.

IV. The NOP does not adequately address the full scope of environmental impacts that should be analyzed in the EIR.

The CEQA Guidelines specify that an NOP shall include a description of the probable environmental effects of the project.²⁴ Here too, the NOP fails to meet CEQA's mandate. Instead, it provides only an incomplete list of the issue areas that would be analyzed in the EIR without discussing *how* the project would have an impact in these areas. The Commission should prepare a new, legally adequate NOP that complies with the requirement to describe the probable environmental effects of the project.

The EIR must also fully analyze each of the following impacts.

²¹ Data Request Response CAUSE -SoCalGas-01, Q.9; CAUSE-SoCalGas-05, Q.3.

²² PEA at 4-8 to 4-13.

²³ Data Request Response CAUSE-SoCalGas-05, Q.2.

²⁴ CEQA Guidelines § 15082.

A. Air Quality

The EIR must analyze the air quality impacts of the project on sensitive receptors, including the elementary school and residences located adjacent to and in close proximity to the compressor station. The EIR should address the impacts of construction and ongoing operations, as well as the impacts of natural gas leaks and both planned and unplanned blowdown events. The EIR must go well beyond the analysis in the PEA, which only minimally discusses blowdown events without quantifying the amounts of air pollutants released. As noted in CAUSE's Protest to A.23-08-019,²⁵ unburned gas released during blowdown events may contain, in addition to methane, various gases and pollutants including benzene, toluene, ethylbenzene, and xylenes, that may cause adverse health impacts. The EIR must examine the impacts of these releases on populations near the Project site.

B. Greenhouse Gases

The EIR must also analyze the greenhouse gas emissions impacts of the project. As with the air quality analysis, the EIR should address the GHG impacts of construction and ongoing operations, as well as methane leaks and blowdown events. Methane is a highly potent greenhouse gas, and blowdown events and leaks are some of the largest sources of gas emissions from compressor stations.²⁶ The EIR should also analyze the reasonably foreseeable indirect impacts of the Project—e.g., whether the Project's operation would discourage electrification or otherwise perpetuate reliance on natural gas and lead to additional emissions of greenhouse gases.

C. Public Health and Safety – Explosion Risk

Natural gas compressor stations pose a demonstrated risk of explosions.²⁷ Here, the risk is particularly grave in light of the elementary school and daycare centers located within a quarter mile of the Project and the dense residential population living within close range of the existing facility. In contrast, the alternative sites are situated farther away from schools and in less densely populated areas. The EIR must analyze the risks presented by explosions at each of the sites under consideration, and should avoid the PEA's flawed methodology. Specifically, the

²⁵ See A.23-08-019, *Protest of Central Coast Alliance for a Sustainable Economy* (Oct. 6, 2023), at p. 9.

²⁶ *Id.* at pp. 8-9 (citing Matthew R. Harrison et al., *Natural Gas Industry Methane Emission Factor Improvement Study Final Report*, EPA (2011) at p. 4,

https://dept.ceer.utexas.edu/ceer/GHG/files/FReports/XA_83376101_Final_Report.pdf.

²⁷ See Sydney Keller, 13KRCG, *Explosion at Tennessee gas plant caused by equipment failure, evacuation order lifted* (Aug. 18, 2023), <https://krcgtv.com/news/nation-world/nashville-tn-area-sheriff-explosion-at-tennessee-gas-plant-no-injuries-hickman-county-local-news>; Natural Gas Intelligence, *BP Investigating Compressor Station Blast* (June 27, 2012), <https://naturalgasintel.com/news/bp-investigating-compressor-station-blast/>.

final Appendix S: Hazard Assessment improperly relies on mismatching methods to study the project and the alternatives, using a qualitative analysis to study alternatives and a quantitative analysis to study the project. Moreover, the qualitative study of the alternatives fails to consider risk in the context of surrounding populations at each site—indeed, the assessment actually *docks* the alternatives for their distance from denser populations.²⁸ Additionally, the quantitative risk assessment of the project only considers explosions capable of causing fatalities—dismissing the real consequences of severe injuries or damage to homes—and uses a very high uncertainty range for the frequency of failures.²⁹ The Commission should avoid replicating these errors, and cannot cut corners on this analysis just because an explosion is a low-probability event. Low probability events do occur, and the consequences here are too dire to avoid an analysis and identification of mitigation measures that could reduce the risks.

D. Noise

Members of the Coalition groups have experienced considerable noise from the Ventura Compressor Station during day-to-day operations. In particular, noise may impact sensitive receptors, including E.P. Foster Elementary School, located across the street from the current facility. The EIR must analyze the potential noise impacts of each alternative and each location under consideration.

E. Public Health and Safety – Soil Disturbance and Valley Fever

Finally, the EIR must analyze risks associated with soil disturbance and valley fever. The PEA does not appear to have examined whether soil at the site has been tested for the *Coccidioides* fungus that causes valley fever, a respiratory infection that can cause serious or long-term health problems.³⁰ The EIR must conduct an analysis of the soils and associated risks of soil disturbance before permitting a project that could threaten the health of nearby residents and schoolchildren.

V. Conclusion

²⁸ See, e.g., Appendix S: Hazard Assessment at 34-35 (noting that remote locations of the Avocado, Devil's Canyon and Ventura Steel sites respectively make it harder for emergency services to reach the alternative locations, but failing to note that the remote locations also reduce the likelihood that a person or home would be hit by an explosion).

²⁹ Appendix S: Hazard Assessment at 7, 12 (discussing limiting impacts to levels capable of causing fatalities) and 9 (noting the high uncertainty in the method used to identify frequency of failures at each spot).

³⁰ CDC, *About Valley Fever*, <https://www.cdc.gov/valley-fever/about/index.html>.

Thank you for the opportunity to comment on the Project. We request that the following individuals receive a copy of the Draft EIR and any other notifications related to the Project and environmental review:

For CFROG:

Kevin Bundy
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Oakland, CA 94612
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rebecca@lozeaudrury.com

Ventura Compressor Station Modernization Project

From: Noelle Burkey <andorra13@gmail.com>
Sent: Tuesday, April 29, 2025 12:19 PM
To: Ventura Compressor Station Modernization Project; john.forsythe@cpuc.ca.gov
Subject: SC GAS Response to Relocation on Taylor Ranch
Attachments: SoCal Gas Response (April 25 2025).pdf

Please see the attached email in response to the interest of placing a Southern California Gas processing plant on Taylor Ranch, owned by the Wood-Claeyssens Foundation.

Noelle Burkey
CEO
Wood-Claeyssens Foundation

Noelle C. Burkey
Chief Executive Officer

Brett L. Burkey
Chief Operating Officer

Jenna M. Burkey
Chief Operating Officer

Charles C. Gray
Chief Financial Officer

Shelby J. Hughes
Secretary

James L. Burkey
Director

J. Brad Burkey
Director

Jared P. Burkey
Director



Founded 1980

www.woodclaeysensfoundation.org

Ailene B. Claeysens
Founder
President Emeritus
1906 - 1995

Pierre P. Claeysens
Founder
President Emeritus
1908 - 2003

Cynthia Wood
Director Emeritus
1937 - 1993

P.O. Box 30586
Santa Barbara, CA 93130

T: 805-966-0543
F: 805-966-1415
office@woodclaeysensfoundation.org

Date: 21 April 2025

To: John E. Forsythe
SoCalGas-Ventura Compressor Modernization
Sacramento, Ca 95814
vcm_ceqa@aspenerg.com

From: The Wood-Claeyssens Foundation

Re: Olive St Compressor Plant

Dear Mr. Forsythe,

We have received your letter (dated April 3, 2025) and attended the April 15, 2025 public meeting in Ventura. The Wood-Claeyssens Foundation (WCF, "the Foundation") is vigorously opposed to the consideration of moving the SoCalGas Ventura Compressor Modernization Project to the Foundation's property (more specifically, the Avocado and Devil's Canyon sites on your map). We do not know who suggested our property for this project, and we were only contacted directly at what seems to be a late stage in the planning process.

The proposed staging area, power lines, and gas lines would be excessively destructive to the property and our business operations. All the areas are occupied by our businesses and are not available for SoCalGas to build upon. The Foundation has many grievances with the consideration of our property for this project.

Firstly, the two sites would significantly interfere with our business activity and income on Taylor Ranch. These would pose great difficulty to both the Foundation and our tenants in running and managing our daily business activities. Your suggested staging area lies in an agriculture field, and your access roads would also run directly through agricultural property. All the suggested spaces for your Compressor Modernization Project on Taylor Ranch are in use - they are not open space nor available as referenced in your handout.

Secondly, the WCF has sufficient difficulty with intruders and theft from the people living in the River, so any additional traffic from outside personnel is considered trespassing. Currently, all outside workers (including SoCaGas personnel) have to sign limited liability agreements for work – they then need to be escorted to the sites to ensure only those routes may be used to inspect the

gas lines.

Thirdly, the WCF does not want any unnecessary structures on the property, especially any that would be in place for years into the future. Your remodeling list includes blowdown towers, tanks, and over 20,000 square feet of structures.

The Wood-Claeyssens Foundation is requesting that the Foundation's property be removed from any consideration of suggested sites for SoCalGas's project. The WCF will not cooperate with your study, and will not allow you on our property nor any trespassers.

Sincerely,



Noelle C Burkey
CEO
The Wood-Claeyssens Foundation

Ventura Compressor Station Modernization Project

From: Duong, Leyna <LDuong@manatt.com>
Sent: Tuesday, May 13, 2025 2:46 PM
To: john.forsythe@cpuc.ca.gov; Ventura Compressor Station Modernization Project
Cc: Waggener, Sigrid; Mostafavi, Payam; Adler, Noah
Subject: Aera Energy LLC Scoping Comments on Ventura Compressor Modernization Project (CPCN Application No. A.23-08-019)
Attachments: Scoping Comments on Ventura Compressor Modernization Project (CPCN Application No. A.23-08-019).pdf

Good afternoon,

Please see the attached letter correspondence regarding the above referenced matter. Kindly confirm receipt of this email and letter.

Thank you,
Leyna Duong
Legal Secretary

Manatt, Phelps & Phillips, LLP
Park Tower

Costa Mesa, CA 92626
D (714) 371-2521 **F** (714) 371-2550
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Sigrid R Waggener
Manatt, Phelps & Phillips, LLP
Direct Dial: (415) 291-7413
swaggener@manatt.com

May 13, 2025

VIA E-MAIL

John E. Forsythe
Project Manager for the Ventura Compressor Modernization Project
CPUC Energy Division, CEQA and Energy Permitting Section
300 Capitol Mall, Suite 518
Sacramento, CA 95814
john.forsythe@cpuc.ca.gov
vcm_ceqa@aspenerg.com

Re: Aera Energy LLC Scoping Comments on Ventura Compressor Modernization Project (CPCN Application No. A.23-08-019)

Dear Mr. Forsythe:

This firm represents Aera Energy LLC ("Aera"), and we are responding to the California Public Utilities Commission's ("CPUC") Notice of Preparation ("NOP") for the Project¹. Although the formal scoping comment period concluded on April 30, 2025, we respectfully request that these comments be accepted into the administrative record and considered during the preparation of the Environmental Impact Report ("EIR") pursuant to the California Environmental Quality Act ("CEQA"). Please be advised that Aera is providing this input because it was specifically invited to do so through written correspondence sent by the Project applicant, Southern California Gas Company ("SoCalGas"), to Aera in late April 2025. It is our understanding that SoCalGas directed this written correspondence to Aera because certain real property owned and/or controlled by Aera has been identified as a potential alternative site for the Project.²

We wish to clarify at the outset that, at this time, Aera has no specific interest in determining where SoCalGas and the CPUC ultimately locate the Project and does not seek to

¹ As used herein, "Project" means and refers to the Certificate of Public Convenience and Necessity Application No. A.23-08-019 to modernize the Ventura Compressor Station, located at 1555 North Olive Street in the City of Ventura.

² Aera is in receipt of SoCalGas' letters dated April 11, 2025 regarding the identification of Aera's property—Assessor's Parcel Numbers ("APNs") 063-0-210-095 and 063-0-210-105 (the "Aera Property")—as a potential alternative site in a feasibility study for a Project presently under review before CPUC. Aera is also in receipt of SoCalGas' letters directed to Shell Oil Co. and North Ventura Properties LLC, also dated April 11, 2025, regarding the same identification of their properties located at APNs 063-0-220-110, 063-0-210-115, 063-0-210-125, 069-0-010-145, 069-0-010-175 (the "Shell Property") and APN 063-0-200-190 (the "NVP Property"). Collectively, the above-referenced APNs are referred to herein as the "Properties."



John E. Forsythe

May 13, 2025

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influence that decision. However, because Aera has been invited to provide input, we offer the following technical observations and information for the CPUC's consideration.

1. Environmental Sensitivity of the "Avocado" and "Devil's Canyon" Alternative Sites

The "Avocado" and "Devil's Canyon" alternative sites, as shown in the NOP Proposed Project Site and Alternatives Map (See [Attachment 1](#)), are located within the Ventura River corridor, an area that presents substantial environmental constraints under CEQA. Both sites exhibit characteristics that make them unsuitable for the siting of major gas compressor infrastructure and merit exclusion from further study.

First, the sites lie in or adjacent to multiple blue-line streams, indicating the presence of intermittent or perennial watercourses. Development in or near these stream-adjacent areas poses significant hydrological concerns, including potential impacts to water quality, erosion control, and floodplain dynamics. These watercourses and their surrounding area also serve as important ecological corridors, and construction activity in the vicinity could fragment sensitive habitat or disrupt connectivity between upland and aquatic ecosystems.

Second, the sites include or border land in active agricultural production, particularly in the case of the "Avocado" site, which supports avocado production. This land contains high-quality agricultural soil and irrigated farmland that contributes meaningfully to Ventura County's agricultural economy. Conversion of this land would conflict with existing agricultural operations, introduce incompatible land uses, and create long-term barriers to continued cultivation.

Locating a large-scale utility project in close proximity to working farmland may result in indirect impacts as well, including the degradation of air quality and water supply reliability, the disruption of pollination and agricultural labor conditions, and the potential for dust, noise, and chemical exposure to affect crop productivity. These land use compatibility concerns are especially problematic in tightly managed orchard systems, where edge effects and external intrusions can undermine long-term yields.

Finally, the development of the Avocado and Devil's Canyon sites would likely involve ground disturbance and vegetation clearance that pose risks to wildlife habitat integrity and increase the potential for significant biological impacts.

Based on these factors—hydrological sensitivity, agricultural resource value, and potential biological constraints—the "Avocado" and "Devil's Canyon" sites are environmentally unsuitable for development of a major gas infrastructure project. These characteristics should weigh heavily in CPUC's alternatives analysis under CEQA and support their exclusion from



John E. Forsythe
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further detailed study. CEQA Guidelines § 15126.6(f)(1) expressly allows for the elimination of alternatives that are infeasible due to legal, environmental, or regulatory constraints.³

2. Current Project Site Appears More Suitable

While Aera takes no formal position on whether the Project is ultimately re-sited in its existing location, we do note that the existing location—the Olive Street site—currently functions as an active gas compressor facility. As such, re-siting the Project in this location would simply be a reuse of property already devoted to gas compressor operations. To the extent the Project’s modernization involves replacing aging equipment with lower-emission infrastructure, future operations at the existing site will likely result in fewer new environmental impacts compared to relocating the entire facility to a greenfield site. Existing utility corridors, site access, and operational compatibility may reduce the need for additional physical disturbance if the existing site is reused.

3. “Ventura Steel” Alternative Site

One of the alternative locations identified in the NOP is the “Ventura Steel” site (See Attachment 1), which is an active pipe storage and staging yard operated by Aera. From a CEQA standpoint, Aera has no major environmental concerns with the potential use of this location. The site is already developed and disturbed, is used for industrial purposes, and exhibits minimal biological sensitivity.

That said, the Ventura Steel site is currently used to support Aera’s ongoing oilfield operations. If SoCalGas were to pursue this alternative, it would be necessary to relocate existing infrastructure and equipment to a new site. Aera would expect SoCalGas to bear the full cost of any such relocation to avoid disruption of existing operations. Subject to this condition, Aera does not object to continued evaluation of the Ventura Steel site and acknowledges it may serve as a reasonably suitable location for the Project from both a CEQA and operational perspective.

However, Aera believes that another site that is also under its control—the decommissioned compressor site—may offer even greater environmental advantages and operational compatibility and therefore warrants separate and serious consideration. This option is discussed below.

4. Additional Alternative Site for Consideration – Aera Decommissioned Compressor Site

Aera respectfully proposes that CPUC also evaluate its decommissioned gas compressor site, located in the eastern portion of Aera-managed property, as an additional location for potential consideration in the EIR as a reasonable alternative under CEQA Guidelines §

³ We also note that the property owner, the Wood-Claeysens Foundation, has requested that the Properties be removed from consideration as alternative sites for the Project.

manatt

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May 13, 2025
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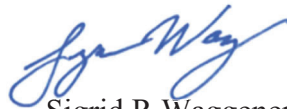
15126.6(c). This site presents an environmentally superior option compared to Ventura Steel. It was previously used for gas compression operations and remains fully disturbed. As such, this site could be readily repurposed to accommodate a modernized replacement facility with very minimal impacts.

The decommissioned compressor site would not require the conversion of agricultural land or the disturbance of sensitive biological or hydrological resources. Moreover, this site is directly accessible via existing oilfield service roads and is operationally and topographically able to support the Project and its infrastructure needs. Its prior use as a compressor station also minimizes the potential for significant land disturbance, construction-related impacts, or incompatibility with adjacent land uses.

Given its prior industrial use, limited environmental sensitivity, and existing access and infrastructure, the decommissioned compressor site should be seriously considered in the EIR as a superior CEQA alternative. Aera is willing to cooperate with CPUC and its consultants to facilitate evaluation of this alternative in the CEQA process. In addition, with a more complete understanding of the Project's technical requirements and parameters, Aera is open to identifying and proposing other potential alternative sites that may meet Project objectives while reducing environmental impacts.

Aera is submitting this letter to fulfill its responsibilities as a property operator identified in the NOP and to clarify the status of lands under its control. Please do not hesitate to contact us should CPUC staff require further information regarding the proposed alternative locations.

Sincerely,



Sigrid R Waggener
Manatt, Phelps & Phillips, LLP

SRW

Ventura Compressor Station Modernization Project

From: THPO Consulting <ACBCI-THPO@aguacaliente.net>
Sent: Monday, March 3, 2025 2:58 PM
To: Ventura Compressor Station Modernization Project
Subject: RE: SoCalGas Ventura Compressor Modernization Project - Notice of Preparation of a Draft EIR

Greetings,

A records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

Best Regards,



Luz Salazar
Cultural Resources Analyst
lsalazar@aguacaliente.net
C: (760) 423-3148 | D: (760) 883-1137
5401 Dinah Shore Drive, Palm Springs, CA 92264

From: Ventura Compressor Station Modernization Project <vcm_ceqa@aspeneg.com>
Sent: Friday, February 28, 2025 1:06 PM
To: Forsythe, John <John.Forsythe@cpuc.ca.gov>
Subject: SoCalGas Ventura Compressor Modernization Project - Notice of Preparation of a Draft EIR

Dear Interested Parties,

The California Public Utilities Commission (CPUC) has published the **Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Southern California Gas Company (SoCalGas) Ventura Compressor Station Modernization Project** (the Proposed Project). The attached NOP includes a description of the Proposed Project, environmental effects that have been identified thus far for consideration in the EIR, and details on the 30-day scoping period. **Written scoping comments must be submitted via email by March 31, 2025, for inclusion in the Draft EIR to vcm_ceqa@aspeneg.com.**

The CPUC will hold one virtual public scoping meeting during a 30-day period for interested parties, agencies and the public on the scope and content of the EIR.

VIRTUAL SCOPING MEETING

Tuesday, March 11, 2025 at 6:00 p.m.

Attend via Zoom: <https://us02web.zoom.us/j/81432321651>

Attend via phone: (669) 900-6833

Webinar ID: 814 3232 1651

Project Overview: The Proposed Project would modernize the Ventura Compressor Station, located at 1555 North Olive Street in the City of Ventura. The scope of the Proposed Project includes:

- (1) replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal HP (estimated horsepower), electric-motor-driven compressors (electric compressors), with zero nitrogen oxide (NOx) emissions, resulting in a “hybrid” compressor station;
- (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 to replace the existing west and south chain-link fence/block wall; and
- (6) implementing other ancillary site improvements, such as piping interconnection and storage tanks.

The existing compressor equipment and temporary office facilities would be decommissioned approximately one year after the new facility has become fully operational.

The CPUC is the lead agency responsible for environmental review of the project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq.

Document Availability: For electronic access to the NOP and other background information, please check the project website at the link below.

<https://ia.cpuc.ca.gov/environment/info/aspen/venturacompressor/vcm.htm>

Thank you for your interest in the project.

Sincerely,
The VCM EIR Team



CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
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COMMISSIONER
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COMMISSIONER
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COMMISSIONER
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STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

March 6, 2025

John E. Forsythe
California Public Utilities Commission (CPUC)
300 Capitol Mall
Sacramento CA 95814

Re: 2025021225 Ventura Compressor Station Modernization Project, Ventura County

Dear Mr. Forsythe:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse

Ventura Compressor Station Modernization Project

From: Mike Dawson <mike@bigredcrane.net>
Sent: Sunday, March 2, 2025 4:59 PM
To: Ventura Compressor Station Modernization Project
Subject: FW: I'm in support of Compressor station

To whom it may concern:

I'm in support of Compressor station
I own land almost next to it.
I have leased land nearby.

Please help this project go thru!
Thank you

Mike Dawson
162 baldwin Rd.
Ojai, CA

Ventura Compressor Station Modernization Project

From: Katie Davis <kdavis2468@gmail.com>
Sent: Monday, March 31, 2025 3:31 PM
To: john.forsythe@cpuc.ca.gov; Ventura Compressor Station Modernization Project
Subject: Scoping Comments for THE VENTURA COMPRESSOR MODERNIZATION PROJECT

John E. Forsythe, CPUC Project Manager
California Public Utilities Commission (CPUC) Energy Division
CEQA and Energy Permitting Section
Email: john.forsythe@cpuc.ca.gov
Project e-mail: vcm_ceqa@aspenerg.com

RE: [NOTICE OF PREPARATION](#) OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING FOR THE VENTURA COMPRESSOR MODERNIZATION PROJECT

Thank you for conducting an EIR of this major new gas infrastructure project. Please address the following potentially significant issues:

1. Regarding "Energy" and whether the Project will result in "wasteful, inefficient, or unnecessary consumption of energy resources," please consider in the context of California's energy and climate goals. Approving this project and doubling down on expensive new gas infrastructure will lock in fossil fuel infrastructure for decades to come. The Ventura Compressor has been operating since 1923, over a hundred years. Either we will need to decommission a new station prematurely, which is wasteful. Or, if the new compressor hangs on until next century, we will be overshooting state GHG reduction goals tremendously. Also, as a result of the state's move to building electrification (as increasingly codified in the state building code) the smaller number of gas customers will be saddled with escalating bills so adding on to those costs with new infrastructure will be wasteful and inefficient. The facility will also use gas and electricity needed by the community.
2. Regarding "Hazards, hazardous materials, and public safety" and other issues. Please also consider the risks of increasing gas storage at the La Goleta Gas Storage Facility. This is inextricably part of the project because the goal of the project is to increase gas stored at La Goleta. The CPUC is tasked with shutting down gas storage facilities, and this project is in direct contradiction to that goal. The CPUC is on record with detailed analysis and plan to "Reduce and Eliminate Reliance on Aliso Canyon" (<https://www.cpuc.ca.gov/news-and-updates/all-news/cpuc-establishes-path-to-reducing-and-eliminating-reliance-on-aliso-canyon>) There is good reason for this. After the Aliso Canyon disaster, SoCalGas had to pay \$1.8 billion to settle personal injury claims from over 35,000 victims.

A similar disaster at the La Goleta Gas Storage field caused or made worse by additional gas from an expanded compressor station is "a reasonably foreseeable accident." The La Goleta gas storage field is the oldest of all. A disaster here would devastate the central coast economy. The field underlies Goleta Beach, a residential area and trailer park, and UCSB with 25,000 students. Isla Vista is the most densely populated area in the region. The field also is next to the Santa Barbara airport, many businesses and downtown Goleta, the commercial hub of the Santa Barbara region.

It is located on rapidly retreating beachside cliffs subject to storm surges, near fault lines, and surrounded by flammable eucalyptus trees. Like Aliso Canyon, the CPUC should be analyzing how to shut it down, not how to expand its use.

3. re: "Alternatives": The La Goleta gas storage facility was expanded in 2013-14 prior to the Aliso Canyon disaster and statewide moves to electrify buildings. It has been under capacity for the past decade without any negative repercussions. The goal to increase gas supplies at La Goleta are based on outdated analysis that fail to take into account newer goals regarding phasing out gas and gas infrastructure.

An analysis of alternatives should project a decline in gas usage. Cities like Santa Barbara and Goleta are encouraging building electrification. Santa Barbara's CCA as well as Central Coast Community Energy serving five counties including Santa Barbara and San Luis Obispo Counties, Goleta, Carpinteria, Santa Maria, etc. are now offering rebates for heat pumps. Industrial uses of gas, such as for oil production, are also declining, and the state law AB 3233 passed in 2024 empowers local jurisdictions to further regulate oil and gas. Perhaps a much smaller facility would be more manageable at one of the alternative locations.

4. re "location": The EIR should evaluate whether compressor stations are appropriate in an urban environment like this. Are there any other compressor stations in California located next to homes and schools? Decision makers should know the degree to which this station is an outlier that should be treated with extra sensitivity and caution, particularly given the extensive public comment on the record about the history of gas releases and pollution from this facility. California's law SB 1137 prohibits oil drilling within 3200 feet of homes and schools. How do the health risks of compressors compare to that of oil drilling? Does it conflict with state law or policies regarding environmental justice? Approving new compressors within this zone would seem to go against the spirit and direction that California is moving in regard to protecting public health via setbacks.

Ventura Compressor Station Modernization Project

From: jim yarbrough <jyarbro2003@yahoo.com>
Sent: Tuesday, April 15, 2025 10:20 PM
To: Ventura Compressor Station Modernization Project
Subject: Comment: Scoping meeting, Ventura, CA, April 15, 2025

The issues at this meeting revolved around SoCalGas' proposal to modernize its Ventura Compressor. I observed the entire meeting. All the people who spoke wanted the compressor to be shut down, and if a new compressor was put into operation, it should be done so at a location safely away from schools or residential communities. A number of people spoke of the need for cleaner energy generation to replace the use of fossil fuels. A number of people claimed that they felt they and/or people they knew had suffered damage to their health, including cancer, because of all the methane leaking from the natural gas compressor at the Ventura site.

No one at this community scoping meeting wanted the compressor to continue its operation at that site which is so close to a school.

This was a good location for the meeting, but the CPUC people there did not bring a mobile sound system and so it was difficult for people to hear some of the public comments. There were about 4 public comments on Zoom which could not be heard at all. This is unacceptable and it is a simple matter to equip the CPUC staff who conduct these meetings with a high-quality, light-weight sound system that includes an amp and microphone(s). By the way, the Spanish-to-English translator did not speak loudly enough to be heard by many of the attendees. She also needed a microphone.

Clearly, the will of that community is that the compressor should NOT continue operation at that site. The compressor must be moved to a location far enough away from people so that it will not sicken the dear children of that community. Clearly, the health of children and people in that community is more important to the people of that community than the money that SoCalGas makes for itself by running a sloppy operation which leaks methane and displays a cruel disregard for the health and safety of the people in that community. It does appear that environmental racism and discrimination against lower income people is at play here. It is hard to imagine SoCalGas daring to run such a compressor in the wealthier neighborhoods of Ventura.

I would add that SoCalGas, besides making people sick with its methane-leaking compressor, is also contributing irresponsibly and dangerously to global warming.

We must phase out the use of fossil fuels and transition to using less energy/energy conservation and cleaner energy generation.

Jim Yarbrough jyarbro2003@yahoo.com Newbury Park, CA

Ventura Compressor Station Modernization Project

From: Richard Neve <rmneve@gmail.com>
Sent: Tuesday, April 15, 2025 1:10 PM
To: Ventura Compressor Station Modernization Project
Subject: I Oppose SoCal Gas West Ventura Compressor Station

To the CPUC,

My name is Richard Neve, I am a long time resident of Ventura. I strong oppose the continued operation of the gas compressor facility operated by SoCal gas. At a bare minimum any changes to site operations should require a full EIR with particular focus on relocating the site out of a residential community.

My mother taught at EP Foster school for many years. She saw first hand elevated rates of respiratory illnesses in her students and colleagues. Luckily, she does not have any long term effects but of course that could change. Any day new symptoms could emerge. NASA has already determined that the site is a super emitter spewing hazardous chemicals into folks home, businesses and schools. Those emissions need to stop as soon as possible.

It is way past time for California to relocate fossil fuel infrastructure out of residential communities. Especially ones like the westside of Ventura. Historically Latino and Black communities have been repeatedly treated as dumping grounds for dirty industry. This legacy of systemic racism needs to be undone. Relocating this gas compressor facility to a site far away from a working class community would further that important goal.

Thank you for your time and consideration on this crucial issue.

Sincerely,
Richard Neve, Ph.D.

Ventura Compressor Station Modernization Project

From: Ann Dorsey <aedorsey@hotmail.com>
Sent: Sunday, April 13, 2025 11:04 AM
To: Ventura Compressor Station Modernization Project
Subject: Public comment regarding the expansion of a SoCalGas compressor station in West Ventura

California Public Utilities Commission,

I am alarmed that SoCalGas has proposed doubling the size of its compressor station in West Ventura. Nearby communities are already being negatively impacted by the station at its current size. Doubling the size will increase those harms, which include air and noise pollution as well as increased risk of injury from an explosion.

When considering this proposal, I urge you to prioritize studying alternative locations and the use of designs that would emit less pollution. The proposed station is near schools and daycare centers in an economically disadvantaged community already dealing with the health and safety risks of compressor stations. Building new polluting equipment in this community would be an environmental justice harm. Additionally, alternatives such as the use of electric and smaller compressors and those proposed by community members should be seriously considered.

Thank you,

Ann Dorsey

Ventura Compressor Station Modernization Project

From: Alana Sheeren <alanasheeren@gmail.com>
Sent: Thursday, April 17, 2025 6:27 PM
To: Ventura Compressor Station Modernization Project
Subject: We need a thorough Environmental Impact Report for the proposed Westside compressor station

To the California Public Utilities Commission,

My name is Alana Sheeren and I am a Ventura resident, a mother, entrepreneur and writer. Though I live in the Pierpont neighborhood, my daughter went to school off Ventura Avenue for 9 years. It is vital that the Commission incorporate the experiences of those who live and work in this community as part of its environmental review.

I am writing to urge you to conduct a thorough Environmental Impact Report for the proposed compressor station, focusing on public safety and air quality. Please don't allow SoCal Gas to limit the review's scope in an attempt to avoid alternatives proposed by the community.

As a community member, I'm deeply concerned about the potential for dangerous blowdown events or leaks. Knowing that NASA identified this compressor station as a "super-emitter" of methane in 2017 is especially alarming—our kids shouldn't be breathing that in during recess, nor should we accept further health risks in a neighborhood already burdened by pollution.

This area is in the 99th percentile for populations living near compressor stations nationwide. That includes our schools and daycares. Building more polluting equipment here would only deepen the environmental injustices our community has faced for too long. This is a chance to do better—by

compressors.

Please don't let SoCalGas limit the scope of this review. Our community deserves a real analysis of alternatives, and a real chance to feel safe and breathe clean air. I appreciate your thorough consideration of this important matter.

Sincerely,
Alana Sheeren

"With life as short as a half taken breath, don't plant anything but love." - Rumi

Ventura Compressor Station Modernization Project

From: Sharon Broberg <slbroberg@gmail.com>
Sent: Monday, April 21, 2025 1:18 PM
To: Ventura Compressor Station Modernization Project
Subject: Deny SoCalGas Compressor Station expansion across from Elementary School

It's time to protect the health and safety of Ventura residents --especially school children!-- We respectfully demand that the California Public Utilities Commission (CPUC) **require a complete environmental review** and **alternative location analysis** for the Ventura gas compressor station.

Please fully address the health and environmental risks of expanding this facility and ultimately prioritize studying alternative locations for the compressor station, with less polluting designs.

John and Sharon Broberg
Santa Barbara zip 93103

Ventura Compressor Station Modernization Project

From: Lucky Lynch <luckyk.lynch@gmail.com>
Sent: Tuesday, April 22, 2025 12:23 PM
To: Ventura Compressor Station Modernization Project
Subject: Compressor Letter - resending

I have to admit that I was surprised that this project on North Olive Street here in Ventura, was STILL being discussed and considered. I have been aware of and advised on this expansion of the compressor station for a number of years. I attended the meeting on Tuesday evening at the request of a colleague for the sole purpose of bringing myself up to date.

And now it is a *modernization* project, still located in the exact same location. Across the street from an elementary school. We have lived in the city of Ventura for 21 years and have watched it grow. We have noticed the gentrification and building projects on the Westside that have increased property values and raised rents! More and more people are moving into the area and larger building projects will be approved, I am certain.

The fact that this station has been present in the Westside community for years, doesn't mean that the project should remain in the area. The Southern California Gas company needs to find another property further away from housing and schools. They rejected the first choice of Devil's Canyon, I believe and are standing firm on their decision to NOT allow the residents to tell them what they want.

Those who object to this project are NOT outsiders. Their voices need to be respected and heard. They won't go away. The existing compressor station needs to be shut down and a modernized site placed elsewhere!

Lucky Lynch
5603 Brubeck Street
Ventura CA 93003

Ventura Compressor Station Modernization Project

From: Jean Bramer <jjeanbramer@aol.com>
Sent: Tuesday, April 22, 2025 4:15 PM
To: Ventura Compressor Station Modernization Project
Subject: Initiate a Complete Environmental Alternative Location Review for Ventura Compressor Stop The Abuse of Our lower income communities.

Dear Gentlefolk,

I strongly object to the expansion of the natural gas compressor (identified as a "Super-emitter" of methane by NASA 2017) in West Ventura near E.P. Foster Elementary School. An alternative location needs to be found at a minimum.

This is Jean Bramer, M.A. CCC SLP. I am a semiretired speech therapist living in Ventura and have taught in the West end area of Ventura.

It is an abuse of that community to add to the risks to health, safety and environment and to locate it right next to an elementary school is unconscionable.

Children and their families are to be protected in all our communities not further victimized because they live in a lower economic area. Why isn't PGE being made to seek other locations and utilize newer less or non -polluting technology instead of continuing as of old and adding to our environmental load of pollution and further victimizing an already pollution burdened community.

Thank you for reading and considering my objections to the expansion of the natural gas compressor in West Ventura.

Sincerely yours,

Jean Bramer

Jean Bramer, M.A. CCC SLP
jjeanbramer@aol.com
Home: 1521 Raccoon Ct., Ventura, CA, 93003

Ventura Compressor Station Modernization Project

From: Madeline Renn <madyrenn@gmail.com>
Sent: Wednesday, April 23, 2025 12:16 PM
To: Ventura Compressor Station Modernization Project
Subject: Please Reconsider Ventura Compressor Location

Hello there,

My name is Madeline, I am a resident of the Ventura Avenue neighborhood and new mom of a beautiful 6 month baby girl.

Since moving to the neighborhood, I've met wonderful neighbors, walked every street, traded produce from my yard, and, unfortunately, developed worse and worse asthma. I am terrified I am exposing my daughter to the same fate living here, so close to the SoCalGas compressor that's leaking methane.

I ask you to please consider the health of our community's children and to prioritize studying alternative locations for the compressor station, with less polluting designs.

Please, please care about us and give us the chance to breathe clean air.

With hope,
Madeline

Ventura Compressor Station Modernization Project

From: Kari Aist <mom4mykids@gmail.com>
Sent: Tuesday, April 22, 2025 9:34 AM
To: Ventura Compressor Station Modernization Project
Subject: Public comment on SCG's proposed update/expansion of the compressor station

To Whom It May Concern--

There is no question that **the Olive Street compressor station should be moved to an alternate location** as far away as possible from the neighborhoods which surround it, largely comprised of marginalized black and brown and socioeconomically disadvantaged folks. To keep it there demonstrates an utter disregard for the well-being of the people of the "Avenue in racism.

In case the reminder is needed, the State of California does not support racism. The County of Ventura, where the processor is located, does not support racism and in 2020 declared it to be a public health crisis: "RESOLUTION NO. 20-126

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF VENTURA

DECLARING RACISM A PUBLIC HEALTH CRISIS AND PLEDGING TO PROMOTE

EQUITY, INCLUSION, AND DIVERSITY IN HOUSING, EMPLOYMENT, ECONOMIC

DEVELOPMENT, HEALTH CARE, AND PUBLIC SAFETY IN THE COUNTY OF VENTURA."

There is no question that if YOUR family lived in that community, if YOUR children attended EP Foster Elementary right across the street, you would not allow anything other than relocation to be considered. If we must continue such extraction, which is an unsettled issue at odds with the State's stated commitment to climate justice, it cannot continue to be located where it threatens the health and well-being of the people who live, work, and go to school in that area.

There is no amount of "updating" that can remove its threats to healthy living, including the harms

If a new project were proposed, even with all the updated "safety" elements, it would *never* be allowed to go in at that site.

Please center Environmental Justice in your decision-making on this matter before it becomes a civil rights legal matter. Let the will of the people who have unilaterally spoken against the proposal abide, rather than bending to the interests of SoCalGas, which by its action has shown that it puts profits above people and prioritizes destructive extraction of a dwindling resource ahead of the well-being of the planet.

Sincerely

--Kari Aist

Pronouns: she, her

805-323-6063

8892 Tacoma Street, Ventura 93004

"Believe with all your heart that how you live your life makes a difference."

--Colin Beavan

"We are each other's harvest; we are each other's business; we are each other's magnitude and bond."

--Gwendolyn Brooks

Ventura Compressor Station Modernization Project

From: Melissa Munoz <melissa_munoz3@my.vcccd.edu>
Sent: Thursday, April 24, 2025 8:41 PM
To: Ventura Compressor Station Modernization Project
Subject: Public Comment Re: Gas Compressor Station in Ventura Ave Neighborhood

My name is Melissa Muñoz. I am a student at Oxnard College, a Fellow at Climate First: Replacing Oil and Gas, better known as CFROG, and a lifelong resident of Ventura County.

Through my fellowship work with CFROG and ties to this community, I have had the opportunity to meet community members and residents living along the Avenue, who are most directly affected by this gas compressor station.

I vividly remember this past October, while canvassing these friendly neighborhoods, seeing kids playing around when suddenly there it was: the gas compressor station.

I'd learned about it, but I was truly baffled to see it just a crosswalk away from E.P. Elementary School.

CFROG has visited the Westside of Ventura to invite community members to informational events and such. While meeting people in the area, we asked residents about their living experiences in dangerous proximity to the compressor station.

I heard very similar complaints:
Occasional nosebleeds
Migraines are far too frequent
Several people with asthma
Children are complaining of the horrible smell
Loud noises
Feelings of unsafety

...

I, too, experienced a very strange reaction to the unhealthy air quality with what felt like allergies flaring, but very fast and very unpleasant. It almost felt difficult to breathe. It made me angry for all the nearby communities forced to put up with this environmental injustice.

No family or child should feel unsafe in their communities

No family should be put in harm's way or put at risk if some leak or blast were to occur

I would like to reference an alarming study conducted by NASA in 2017, identifying this compressor in the backyard of many as a super emitter of methane.

I would like to urge the commission to prioritize and keep in mind that the well-being of the people of Ventura lies in their hands, and therefore, a thorough study of an alternative location for this compressor station must be done with plans for a significantly less polluting modern design. Keeping in mind that the proposed site stands in the 99th percentile for communities near compressor stations in the entire U.S., which includes schools, daycares, and community spaces.

The residents of Ventura, but these neighborhoods in particular, deserve better and need to be protected and heard.

Thank you.

-Melissa Muñoz

Ventura Compressor Station Modernization Project

From: Julie Henszey <juliehenszey@gmail.com>
Sent: Saturday, April 26, 2025 8:03 AM
To: Ventura Compressor Station Modernization Project
Subject: Inquiring a second time: Zoom recording from April 15 meeting at Belle Arts Factory, Ventura

Hello. A public input meeting took place on April 15 at the Belle Arts Factory in Ventura concerning the Gas Compressor Station expansion project. I attended in person.

a couple of times. Also, we didn't get to hear the comments of virtual attendees. **And we were told the recording would be available.**

Thank you,

Julie

--

Julie Henszey

(She/Her)

805-657-2793

juliehenszey@gmail.com

<https://www.linkedin.com/in/juliehenszey>

Residing in Ventura on unceded Chumash Territory

Ventura Compressor Station Modernization Project

From: Denia Diaz <deniag5demar@gmail.com>
Sent: Sunday, April 27, 2025 9:21 PM
To: Ventura Compressor Station Modernization Project
Subject: Compressor station negative impact

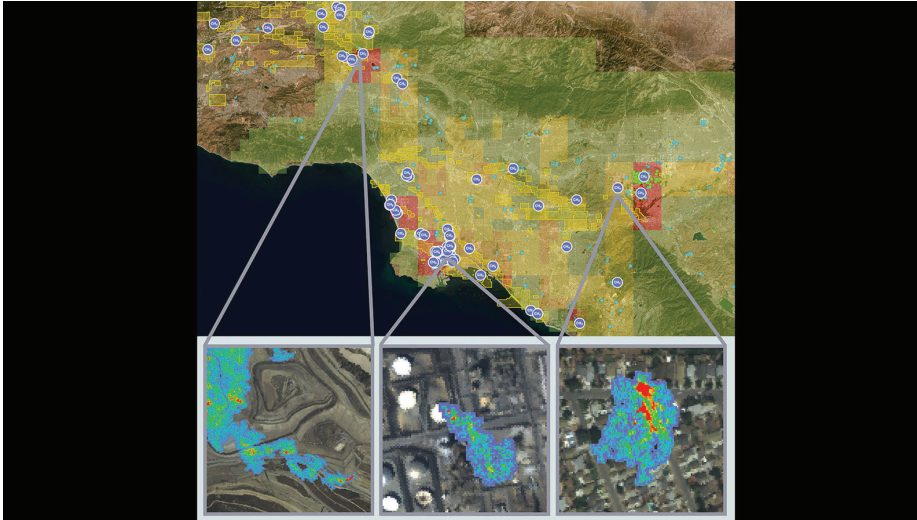
1. To whom it may concern. My name is Denia Gonzalez, As a resident of Ventura West side and on behalf of the ones who are unable to speak, I'm writing of my concerns of the importance, impactful and dangers of the SoCal gas compressor in our residential area. The Commission should incorporate the experiences of the community in its environmental review, not just what it hears from SoCalGas. Public safety: Fearing a blast that will harm kids on their way to school, or neighbors nearby. Air quality: Leaks or big blowdown events that kids breathe in at recess .[In 2017, NASA identified this compressor station as a "super-emitter" of methane](#). Noise levels: Ongoing noises that distract kids in classrooms or prevent neighbors from enjoying hanging out outside. The proposed site is in the 99th percentile for populations near compressor stations in the entire country, and that includes schools and daycares, even our pets and animals suffer from it. The Commission needs to study electric and smaller compressors, and it shouldn't let SoCalGas limit the scope of CEQA review to avoid alternatives proposal. Please, consider our need as a community, this beautiful Ventura is our home, our safe place and our health depend on you now. Thank you. Denia Gonzalez.



NEWS | November 6, 2019

A Third of California Methane Traced to a Few Super-Emitters

By Esprit Smith,
NASA's Earth Science News Team



Views from NASA's Methane Source Finder, a tool that provides methane data for the state of California. The data are derived from airborne remote-sensing, surface-monitoring networks and satellites and are presented on an interactive map alongside infrastructure information. Credit: NASA/JPL-Caltech

[Larger view](#)

NASA scientists are helping California create a detailed, statewide inventory of methane point sources — highly concentrated methane releases from single sources — using a specialized airborne sensor. The new data, published this week in the journal *Nature*, can be used to target actions to reduce emissions of this potent greenhouse gas.

Like carbon dioxide, methane traps heat in the atmosphere, but it does so more efficiently and for a shorter period of time. Scientists estimate that most methane emissions in California are driven by industrial facilities, such as oil and gas fields, large dairies and landfills. To help reduce methane's impact on climate, the state has made cutting human-caused emissions a priority. But in order to cut these hard-to-detect emissions, they have to be measured and the sources identified.

NASA, through partnerships with the California Air Resources Board (CARB) and the California Energy Commission, set out to do just that. Over a two-year period, a research team at NASA's Jet Propulsion Laboratory in Pasadena, California, flew a plane equipped with the Airborne Visible InfraRed Imaging Spectrometer - Next Generation (AVIRIS-NG) instrument over nearly 300,000 facilities and infrastructure components in those sectors. The instrument can detect plumes of methane in great detail. Each pixel covers an area of about 10 feet (3 meters) across, which allows scientists to see even small plumes that often go undetected.

The team identified more than 550 individual point sources emitting plumes of highly concentrated methane. Ten percent of these sources, considered super-emitters, contributed the majority of the emissions detected. The team estimates that statewide, super-emitters are responsible for about a third of California's total methane budget.

Emissions data like this can help facility operators identify and correct problems — and in turn, bring California closer to its emissions goals. For example, of the 270 surveyed landfills, only 30 were observed to emit large plumes of methane. However, those 30 were responsible for 40 percent of the total point-source emissions detected during the survey. This type of data could help these facilities to identify possible leaks or malfunctions in their gas-capture systems.

"These findings illustrate the importance of monitoring point sources across multiple sectors [of the economy] and broad regions, both for improved understanding of methane budgets and to support emission mitigation efforts," said the lead scientist on the study, Riley Duren, who conducted the work for NASA's Jet Propulsion Laboratory.



Initial results have been shared with facility operators in California to make them aware of the need to improve their methane-leak detection processes and to institute better controls on methane emissions. Results will also be used to help state and local agencies and businesses prioritize investments in emission mitigation.

Although the survey provides a detailed map of methane emissions for the areas observed in the state, researchers caution that this was the first attempt to estimate emissions for individual methane sources from a large population distributed across such an extensive area over multiple years.

Additionally, this survey was designed to detect highly concentrated releases of methane from a single component or piece of industrial equipment, such as an oil well. The survey excluded non-point sources, such as small natural gas leaks from millions of homes, because even though they may have a collective impact on atmospheric methane levels, their individual emissions are below the detection levels of this method.

The survey builds on a decade of cooperation between NASA, CARB and the California Energy Commission to support the state's ambitious climate change mitigation program, specifically on the study of air pollution impacts from the oil and gas sector.

"This new remote-sensing technology addresses the continuing need for detailed, high-quality data about methane," said California Air Resources Board Chair Mary D. Nichols. "It will help us and the Energy Commission develop the best strategies for capturing this highly potent greenhouse gas."

The final report of the California Methane Survey will be available in the fall.

The map and data from this survey can be viewed here:

<http://methane.jpl.nasa.gov/>

News Media Contact

Arielle Samuelson
Jet Propulsion Laboratory, Pasadena, Calif.
818-354-0307
arielle.a.samuelson@jpl.nasa.gov

This website is produced by the Earth Science Communications Team at
NASA's Jet Propulsion Laboratory | California Institute of Technology

Site last updated: September 21, 2023

Ventura Compressor Station Modernization Project

From: Alison Huyett <alisonhuyett@gmail.com>
Sent: Monday, April 28, 2025 10:10 AM
To: Ventura Compressor Station Modernization Project
Subject: Scoping period public comments for SoCal Gas Compressor Station EIR

To the California Public Utilities Commission,

Thank you for the opportunity
scoping period.

My name is Alison Huyett, I am a homeowner on the Westside of Ventura and live just a half a mile from the current SoCal Gas Compressor site. I learned about the expansion project through a flyer I received from SoCal Gas at my door. It was not until our community came together to demand more transparency that we really learned what was happening just a few blocks away.

I have a three year old who will be in the district for EP Foster Elementary. We bike and walk daily in our neighborhood, we go to the local parks, use the bike path. We love our community. I don't want to be worried about my child's health or any child's health or be in fear that a leak will happen and we'll have to evacuate like Aliso Canyon or, even worse, an explosion happens and we are seriously in danger. My family, like all families on the Ave, deserve the right to have clean air and a healthy community. While there was a time and place for industrial facilities like the Compressor site, when the area was not so residential, we need to evolve and look at what is best for the future of our residential community. Please put our families and children ahead of what a major utility wants.

In your Environmental

Please do not limit the scope of CEQA review to avoid alternatives proposed by the community - alternative locations should be looked at that move this facility somewhere where it is not next to homes and a school. We deserve a cleaner future, please help us do that.

Thank you for your time,

Alison

Ventura Compressor Station Modernization Project

From: margot davis <wally97@icloud.com>
Sent: Tuesday, April 29, 2025 11:13 AM
To: Ventura Compressor Station Modernization Project
Subject: So Cal gas polluting compressor

to whom it may concern: it is imperative that this compressor be moved to an alternative site far away from residences and schools. If the gas company came to PUC today and petition to locate the compressor for the first time where it is now you would never approve it, and so it follows, that it can't stay where it is, it must be moved to an alternative site or shut down. Thank you very much margot davis 148 W. Simpson Ventura, CA 93001 my address is located in the half mile incineration zone.

Sent from my iPhone

Ventura Compressor Station Modernization Project

From: Emma Aist <emmma.i.aist@gmail.com>
Sent: Tuesday, April 29, 2025 5:24 PM
To: Ventura Compressor Station Modernization Project
Subject: Public comment on SoCal Gas's proposed update/expansion of the compressor station on Olive Street

To Whom It May Concern,

There is no question that the Olive Street compressor station should be moved to an alternate location comprised of marginalized black and brown and socioeconomically disadvantaged folks. To keep it there demonstrates an utter disregard for the well-being of the people of the "Avenue," and is a decision rooted in racism.

In case the reminder is needed, the State of California does not support racism. The County of Ventura, where the processor is located, does not support racism and in 2020 declared it to be a public health crisis: "RESOLUTION NO. 20-126

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There is no question that if YOUR family lived in that community, if YOUR children attended EP Foster Elementary right across the street, you would not allow anything other than relocation to be considered. If we must continue such extraction, which is an unsettled issue at odds with the State's stated commitment to climate justice, it cannot continue to be located where it threatens the health and well-being of the people who live, work, and go to school in that area.

There is no amount of "updating" that can remove its threats to healthy living, including the harms caused by its regular release of gases and the fact that most of the area lies within its "incineration zone." If a new project were proposed, even with all the updated "safety" elements, it would *never* be allowed to go in at that site.

Please center Environmental Justice in your decision-making on this matter before it becomes a civil rights legal matter. Let the will of the people who have unilaterally spoken against the proposal abide, rather than bending to the interests of SoCalGas, which by its action has shown that it puts profits above people and prioritizes destructive extraction of a dwindling resource ahead of the well-being of the planet.

-- Emma Aist

Ventura Compressor Station Modernization Project

From: Danielle O'Dea <odea@buen-vecino.org>
Sent: Wednesday, April 30, 2025 6:22 PM
To: Ventura Compressor Station Modernization Project
Subject: Opposition: Natural Gas Compressor

Hello,

I am a resident of Ventura County and writing to state my OPPOSITION to the construction of the natural gas compressor on the Avenue in Ventura. This toxic infrastructure poses significant risks to our community's health, safety, and environment. Please consider alternative locations for the compressor station, along with less polluting designs. You risk the health and lives of students and the public with its current development location. Thank you.

Best regards,
Danielle Ua Deághaidh (O'Dea)
They/Elle
[Buen Vecino](#) - *Community Organizer*
Situated on the traditional and unceded territory of the Ventureño Chumash



Ventura Compressor Station Modernization Project

From: Brenda Holmes <holmcent@msn.com>
Sent: Wednesday, April 30, 2025 8:31 PM
To: Ventura Compressor Station Modernization Project
Subject: Compressor Station

I was shocked to hear SoCal gas was considering putting in a compressor station next to an elementary school.

My name is Brenda Holmes. My Uncle, Elmer Eifling, was the Blythe SoCal Pumping station manager for many years. I know he would have been as disappointed as I am to hear that SoCal gas would be considering something that could potentially have such a negative effect on children in this area.

Thank you,
Brenda Holmes

E.P. Foster Elementary School could effect the

Ventura Compressor Station Modernization Project

From: Noah Aist <aistnoah8@gmail.com>
Sent: Tuesday, April 29, 2025 8:05 PM
To: Ventura Compressor Station Modernization Project
Subject: Public Comment regarding SoCalGas's proposed expansion of the compressor station on Olive Street in Ventura CA

To Whom It May Concern:

You must relocate the compressor station in the "Avenue" neighborhood which is directly across the street from EP Foster Elementary School. Expanding or upgrading this facility at its current site is unacceptable, given its documented harm to the health of nearby students and residents. There are

station in this location is an example of environmental racism: a pattern in which policies fail to protect predominantly Black, Brown, and economically disadvantaged communities, instead prioritizing corporate profit over public health and safety.

Do the right thing, and do not allow this dangerous compressor station to harm our community.

Sincerely,
Noah Aist
8892 Tacoma Street
Ventura CA 93004

Ventura Compressor Station Modernization Project

From: Paul Aist <paulaist@gmail.com>
Sent: Tuesday, April 29, 2025 9:07 PM
To: Ventura Compressor Station Modernization Project
Subject: Public Comment on SoCalGas's Proposed expansion of the compressor station on Olive Street in Ventura, CA.

The So Cal Gas compressor station on Olive Street directly across the street from EP Foster Elementary School must not be expanded and in fact needs to be moved out of the neighborhood. Natural gas compression sites and storage sites are inherently dangerous. This site would not be allowed to be built from scratch in such a neighborhood and should not be allowed to stay.

Do the right thing by this community and move the site out of the neighborhood.

Paul Aist
Ventura, CA.

Ventura Compressor Station Modernization Project

From: Kari Aist <mom4mykids@gmail.com>
Sent: Tuesday, April 22, 2025 9:34 AM
To: Ventura Compressor Station Modernization Project
Subject: Public comment on SCG's proposed update/expansion of the compressor station

To Whom It May Concern--

There is no question that **the Olive Street compressor station should be moved to an alternate location** as far away as possible from the neighborhoods which surround it, largely comprised of marginalized black and brown and socioeconomically disadvantaged folks. To keep it there demonstrates an utter disregard for the well-being of the people of the "Avenue in racism.

In case the reminder is needed, the State of California does not support racism. The County of Ventura, where the processor is located, does not support racism and in 2020 declared it to be a public health crisis: "RESOLUTION NO. 20-126

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There is no question that if YOUR family lived in that community, if YOUR children attended EP Foster Elementary right across the street, you would not allow anything other than relocation to be considered. If we must continue such extraction, which is an unsettled issue at odds with the State's stated commitment to climate justice, it cannot continue to be located where it threatens the health and well-being of the people who live, work, and go to school in that area.

There is no amount of "updating" that can remove its threats to healthy living, including the harms

If a new project were proposed, even with all the updated "safety" elements, it would *never* be allowed to go in at that site.

Please center Environmental Justice in your decision-making on this matter before it becomes a civil rights legal matter. Let the will of the people who have unilaterally spoken against the proposal abide, rather than bending to the interests of SoCalGas, which by its action has shown that it puts profits above people and prioritizes destructive extraction of a dwindling resource ahead of the well-being of the planet.

Sincerely

--Kari Aist

Pronouns: she, her

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8892 Tacoma Street, Ventura 93004

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--Colin Beavan

"We are each other's harvest; we are each other's business; we are each other's magnitude and bond."

--Gwendolyn Brooks

Ventura Compressor Station Modernization Project

From: Shanti Sandosham <shantisandosham@gmail.com>
Sent: Tuesday, April 29, 2025 10:34 PM
To: Ventura Compressor Station Modernization Project
Subject: Public comment on SCG's proposed update/expansion of the compressor station

To Whom It May Concern--

There is no question that **the Olive Street compressor station should be moved to an alternate location** as far away as possible from the neighborhoods which surround it, largely comprised of marginalized black and brown and socioeconomically disadvantaged folks. To keep it there demonstrates an utter disregard for the well-being of the people of the "Avenue," and is a decision rooted in racism.

There is no question that if YOUR family lived in that community, if YOUR children attended EP Foster

To be in line with State's stated commitment to climate justice, the ideal would be to shut down this compressor station all together and end the extraction. But it most certainly cannot continue to be located where it threatens the health and well-being of the people who live, work, and go to school in that area.

There is no amount of "updating" that can remove its threats to healthy living, including the harms caused by its regular release of gases and the fact that most of the area lies within its "incineration zone." If a new project were proposed, even with all the updated "safety" elements, it would *never* be allowed to go in at that site.

The following effects of the compressor station must be researched, including but not limited to air quality, noise pollution, methane emissions, and public safety and comfort. The children at the nearby school should not have to live in fear of explosions.

Alternative sites have been discussed, including at the recent scoping meeting and many of them are much more favorable. Specifically one that is not in The Avenue or a very populated area.

Please center Environmental Justice in your decision-making on this matter before it becomes a civil rights legal matter. Let the will of the people who have unilaterally spoken against the proposal abide, rather than bending to the interests of SoCalGas, which by its action has shown that it puts profits above people and prioritizes destructive extraction of a dwindling resource ahead of the well-being of the planet.

Ventura Compressor Station Modernization Project

From: Ian Campbell <ian.w6ian@gmail.com>
Sent: Tuesday, April 29, 2025 10:41 PM
To: Ventura Compressor Station Modernization Project
Subject: Public comment on SCG's proposed update/expansion of the compressor station

To Whom It May Concern--

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Ventura Compressor Station Modernization Project

From: Michelle <michellekemick@gmail.com>
Sent: Wednesday, April 30, 2025 9:33 AM
To: Ventura Compressor Station Modernization Project
Subject: Gas compressor Ventura California

NO to expanding Ventura's gas compressor which is already too close to homes and schools. It's a danger and needs to be moved elsewhere.

Michelle Kemick.

Ventura Compressor Station Modernization Project

From: James Baylis <jambaylis@gmail.com>
Sent: Wednesday, April 30, 2025 4:39 PM
To: Ventura Compressor Station Modernization Project
Subject: Demanding Independent Environmental Review for Westside Ventura Compressor Station

Hello,

I've lived on The Avenue for a few years and I have friends who live a block away from the SoCalGas compressor station. I've been very concerned about the proposed expansion ("modernization") of the compressor station in the Westside of Ventura. The site is a danger to the public - it is constantly leaking (SoCalGas denies this but you can smell the mercaptan from the street) and presents a potential explosion hazard right next to a school full of children. I understand that it is not *likely* to explode, but accidents do happen, and **the correct amount of risk for such an event in such a location**—within a densely populated residential neighborhood, next to a school—**is ZERO**.

An updated plant, with greater capacity, in the same location, is not an acceptable solution to the problem of the outdated facility. I will just quickly mention that we now must be finding solutions to quickly reduce our reliance on fossil fuels or face dire consequences in the near future. An expansion of this facility will put us on the wrong side of history.

Thank you for reading my concerns,
James Baylis

Ventura Compressor Station Modernization Project

From: Nicolette W <nicolettemarie311@gmail.com>
Sent: Wednesday, April 30, 2025 8:48 PM
To: Ventura Compressor Station Modernization Project
Subject: Ventura Compressor Station

To whom it may concern,

My name is Nicolette Walker-Itza and I am a concerned citizen that has lived and worked in Ventura County my whole life. I am raising my daughter in a small suburb between Ojai and Ventura, close to the site of the compressor station in Ventura, CA.

I am writing to demand that the CPUC fully address the health and environmental risks of expanding the Ventura, CA facility, and ultimately prioritize studying alternative locations for the compressor station, with less polluting designs.

The Commission should incorporate the experiences of the community in its environmental review, not just what it hears from SoCalGas. Public safety should be priority number one. As the mother, I am extremely concerned for the impact an explosion could have on the community. An explosion could harm kids at or on their way to school, neighbors nearby, local wildlife, as well as the residual effects of destruction and pollution that would affect an even wider population with unknown effects.

In 2017, NASA identified this compressor station as a “super-emitter” of methane. This pollution, coupled with the possibility of an explosion, should be enough for the Commission to prioritize studying alternative locations for the compressor station, with less polluting designs that wouldn't harm people. The proposed site is in the 99th percentile for populations near compressor stations in the entire country, and that includes schools and daycares. This is dangerous and reckless.

This is an opportunity to remedy a legacy of pollution in our community. End the environmental racism and relocate the project out of this disadvantaged community!

There are alternative locations that can and should be considered. Three were named at the recent scoping meeting. I urge the Commission to act with responsibility and to take steps to create a cleaner, safer, and more just future for everyone.

Thank you,

Nicolette Walker-Itza
Ojai, CA

Ventura Compressor Station Modernization Project

From: Sonia Kroth <soniapkm@gmail.com>
Sent: Wednesday, April 30, 2025 11:42 PM
To: Ventura Compressor Station Modernization Project
Subject: Proposed expansion of SoCal Gas Compressor on Olive Street, Ventura CA

To Whom It May Concern,

I am writing to strongly, oppose the expansion and upgrading of the SoCal gas compressor station on Olive Street in Ventura, California. I have lived within three blocks of this compressor station for more than 15 years and for many of those years, was unaware of its existence and the potential threat it poses to my family and the many individuals, families and school children who live, learn and play within a dangerous blocks of the facility.

This is a low income neighborhood with many hard-working families of color who should not bear the brunt of policies that target such neighborhoods.

The compressor station should not be allowed to expand and should instead be moved to a safer, more remote location.

Thank you for your attention and action to ensure the safety of our community.

Sincerely,

Sonia Kroth
133 E Vince St
Ventura, CA 93001