

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.



BBK
BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW

Kari Cameron
Senior Paralegal
kari.cameron@bbklaw.com
T: (541) 318-9827
bbklaw.com | [in](#) [@](#)

**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**

Howard V. Golub
Best Best & Krieger LLP
1333 North California Boulevard
Suite 220
Walnut Creek, California 94596
Telephone: (925) 977-3323
Facsimile: (925) 977-1870
E-mail: hgolub@bbklaw.com

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
*Attorneys for the City of San
Buena Ventura, California, a
municipal corporation*

April 29, 2025

**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**

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:

Howard V. Golub
Best Best & Kreiger LLP
1333 North California Boulevard
Suite 220
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

By: Howard V. Golub
Best Best & Krieger LLP
1333 North California Boulevard
Suite 220
Walnut Creek, California 94596
Telephone: (925) 977-3323
Facsimile: (925) 977-1870
E-mail: hgolub@bbklaw.com

***Attorneys for the City of San
Buenaventura California, a
municipal corporation***

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

*Attorneys for the City of San
Buenaventura, California, a
municipal corporation*

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@SemptraUtilities.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.

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.

compressors (electric compressors), with zero nitrogen oxide (NO_x) 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.”

CPUC Communications Division

April 30, 2025

Page 4

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@aspeneg.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

**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.



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

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 (OEHHA).

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](#)

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."

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.



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

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,

A handwritten signature in blue ink that reads "Dave Ward". The signature is stylized with a large, looped "D" and "W".

Dave Ward, AICP
Planning Director

CC: Supervisor Matt Laverre, 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

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	6.8	6.8	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	30.8	35	17	25
Subtotal (*10)	260	320	230	280	290	350	308.320	350.370	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	241-242*	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.

□ 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.

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:

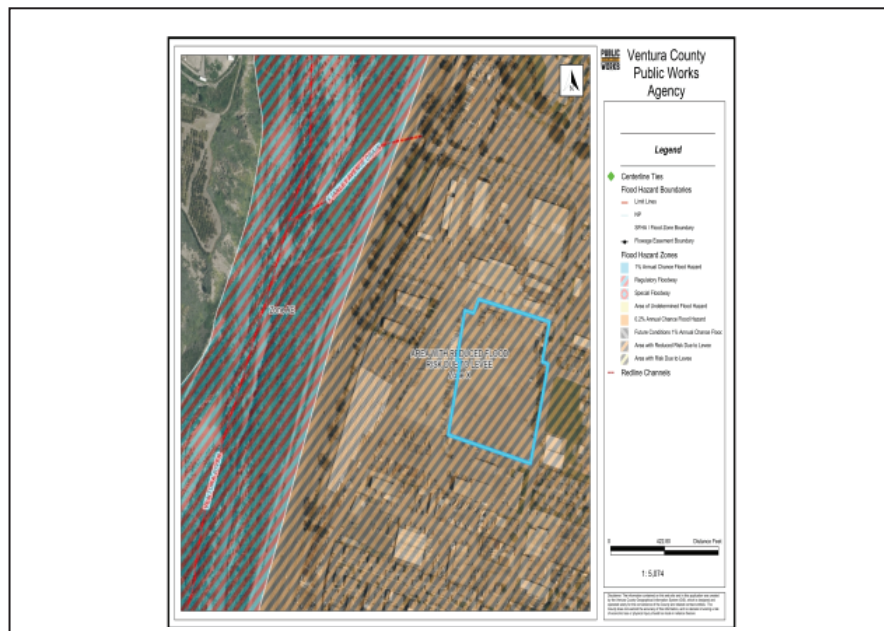
- (1) replacing three existing 1,100 horsepower (HP) natural-gas-driven compressors (natural gas compressors) with two new 1,900 HP natural gas compressors, equipped with state-of-the art emission control technology to meet Best Available Control Technology (BACT) standards, and two new 2,500 nominal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

- **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.



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.

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

Confidentiality Notice: This message and any attachment(s) may contain privileged or confidential information. Unauthorized interception, review, use or disclosure is prohibited by law. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. Thank you.

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://bsky.app/profile/missionvespa.bsky.social)



The information contained in this email message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this email message in error, please notify the sender by reply email and delete the message and any attachments.

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.bsky.social](#)



The information contained in this email message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this email message in error, please notify the sender by reply email and delete the message and any attachments.



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
Aaron Stanton
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102
(415) 552-7272
Bundy@smwlaw.com
Stanton@smwlaw.com

For CAUSE:

Matthew Vespa
Ada Statler
Earthjustice
50 California St., Suite 500
San Francisco, CA 94111
(415) 217-2056
mvespa@earthjustice.org
astatler@earthjustice.org

For Patagonia, Inc.:

Rebecca Davis
Lozeau Drury LLP
1938 Harrison St., Suite 150
Oakland, CA 94612
(510) 836-4200
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@aspeneg.com

From: The Wood-Claeysens 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-Claeysens 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,

A handwritten signature in black ink, appearing to read "Noelle C. Burkey". The signature is fluid and cursive, with the first name "Noelle" being more prominent.

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
LDuong@manatt.com

[manatt.com](https://www.manatt.com)

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it, may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivery or use of any of the information contained in or attached to this message is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify

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."

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

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-Claeyssens Foundation, has requested that the Properties be removed from consideration as alternative sites for the Project.

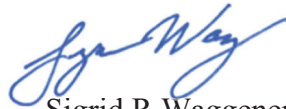
15126.6(c). This site presents an environmentally superior option compared to Ventura Steel. It was previously used for gas compression operations and remains fully disturbed. As such, this site could be readily repurposed to accommodate a modernized replacement facility with very minimal impacts.

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,

A handwritten signature in blue ink, appearing to read "Sigrid R Waggener".

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@aspenerg.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@aspenerg.com.**

The CPUC will hold one virtual public scoping meeting during a 30-day period. 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

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/asp/venturacompressor/vcm.htm>

Thank you for your interest in the project.

Sincerely,
The VCM EIR Team



NATIVE AMERICAN HERITAGE COMMISSION

March 6, 2025

John E. Forsythe
California Public Utilities Commission (CPUC)
300 Capitol Mall
Sacramento CA 95814

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

COMMISSIONER
Vacant

ACTING EXECUTIVE
SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

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 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

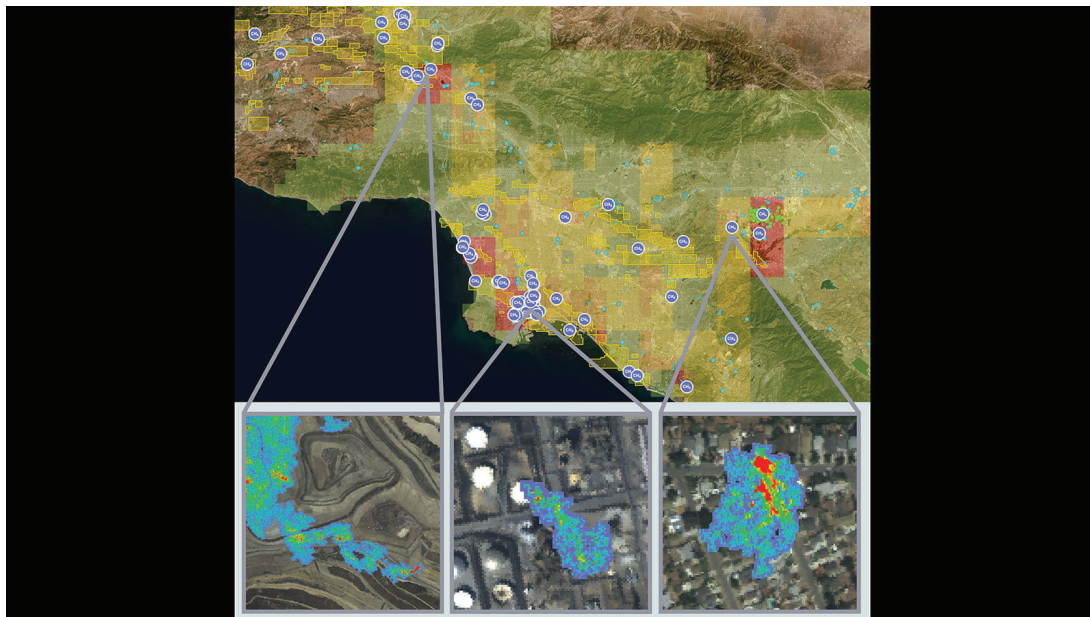
From: Denia Diaz <deniag5demar@gmail.com>
Sent: Sunday, April 27, 2025 9:21 PM
To: Ventura Compressor Station Modernization Project
Subject: Compressor station negative impact

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 methane-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

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: Emmma 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

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 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.

-- Emmma 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

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: 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--

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 Elementary right across the street, you would not allow anything other than relocation to be considered. 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: 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