

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: [EXTERNAL] Ventura Compressor Station Modernization Project, Pre-filing Review Report  
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**From:** Rosauer, Michael <michael.rosauer@cpuc.ca.gov>  
**Sent:** Friday, June 23, 2023 11:22 AM  
**To:** [REDACTED]@socialgas.com>; [REDACTED]@socialgas.com>; [REDACTED]@socialgas.com>  
**Cc:** Brewster Birdsall <Bbirdsall@aspenerg.com>; Lee, Betty J. <betty.lee@cpuc.ca.gov>; Borak, Mary Jo <maryjo.borak@cpuc.ca.gov>  
**Subject:** [EXTERNAL] Ventura Compressor Station Modernization Project, Pre-filing Review Report

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Please see the attached report of our pre-filing review of the Draft PEA filed 5/24/2023.

Thanks,  
Mike

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# PRE-FILING CONSULTATION REVIEW

## Ventura Compressor Station Modernization Project

*Prepared for*  
**CPUC Energy Division**

*Submitted by*



**June 2023**

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## 1. OVERVIEW

Southern California Gas Company (SoCalGas) must prepare and submit to the CPUC an application for a Certificate of Public Convenience and Necessity (CPCN) for the proposed Ventura Compressor Station Modernization Project (Project). The CPUC requires that all applications for projects that are not statutorily or categorically exempt from CEQA requirements shall include an Applicant-prepared Proponent's Environmental Assessment (PEA).

### 1.1. Pre-filing Consultation Process

Pre-filing Consultation is a process for project Proponents (Applicants) to engage with CPUC Energy Division CEQA Unit Staff about upcoming projects that will require environmental review pursuant to CEQA. During Pre-filing Consultation, applicants and CPUC CEQA Unit Staff meet to discuss the upcoming application. The Pre-filing Consultation process is described in the CPUC's 2019 Guidelines for Energy Project Applications Requiring CEQA Compliance: *Pre-filing and Proponent's Environmental Assessments*, that include the PEA Checklist.

Under CPUC General Order 177 for Gas Infrastructure, no later than 30 days after the filing of the application for a CPCN, the CPUC Staff must review the application and notify the utility of any deficiencies in the information and data submitted in the application.

The Applicant has the obligation to file a complete Draft PEA at least three months prior to filing the application for a CPCN. SoCalGas uploaded a Draft PEA for the Ventura Compressor Station Modernization Project on May 24, 2023.

The CPUC CEQA Unit Staff and the CPUC consultant team (Aspen Environmental Group) have the obligation to review and provide comments on the Draft PEA to the Applicant early in the three-month period to allow time for the Applicant to incorporate revisions to the formal PEA.

### 1.2. Use of the PEA Checklist

The PEA Checklist included within the 2019 Pre-filing Guidelines provides Applicants with detailed guidance about information that the CEQA Unit Staff expects in a sufficient PEA. The CPUC consultant team uses the PEA Checklist to focus on the types, scope, and thoroughness of data expected for data adequacy purposes and for the PEA to be deemed complete.

For a PEA that is developed according to the 2019 Pre-filing Guidelines and PEA Checklist, the CEQA Unit Staff and CPUC consultant team will be able to efficiently determine PEA completeness.

This pre-filing review follows the organization of the PEA Checklist and provides comments to SoCalGas, as the Applicant, for discussion between the CPUC CEQA Unit Staff and the CPUC consultant team prior to PEA filing, to allow time for Applicant-revisions to the PEA.

## 2. PRE-FILING REVIEW OF DRAFT PEA SECTIONS

The CPUC CEQA Unit Staff and Aspen Environmental Group reviewed the Draft PEA for the Ventura Compressor Station Modernization Project submitted on May 24, 2023. This report summarizes the results of our pre-filing review.

### Request:

1. **Basic PEA Data Needs.** Upon formal filing of the PEA, please provide a **Mailing List** that includes the names and addresses of all affected landowners and residents, including unit numbers for multi-unit properties, for both the proposed project and alternatives (see pp. 4-5, Pre-filing Guidelines).

### 2.1. Executive Summary

No comments at this time for Draft PEA, Section 1, Executive Summary.

### 2.2. Introduction

**Checklist Section 2.1.1, Purpose and Need.** The Draft PEA provides a chart for 2011-2020 and summarizes the need for the proposed project (p. 2-4). The need is related to a “change in the operating environment” influenced by supply and demand on the North Coastal System and use of the La Goleta Storage Field.

### Requests:

2. Please identify and itemize the “compressor design limits” (p. 2-5) that may be limiting factors for the existing compressors.
3. Please expand on how the trend in supply and demand affects operation of the existing compressors at the Ventura Compressor Station. For example, additional information could:
  - Chart historic trends of annual hours-of-operation for the existing compressors to show whether these have increased;
  - Provide historic data on actual gas flows through the existing compressors;
  - Tabulate prior overhauls and preventative maintenance activities to show whether these have become more frequent; and
  - Tabulate historic trends in planned and unplanned outages of the existing compressors.
4. Scenarios in the Draft PEA analyses of energy and greenhouse gas emissions assume that the La Goleta Storage Field may begin the summer season with a gas inventory level of zero (completely depleted). Consider adding historic data to show trends in the gas inventory levels at the storage field, to demonstrate if they have become more constrained in recent years.

### 2.3. Project Description

**Checklist Section 3.3.4 Proposed Facilities.** New gas piping tie-ins do not appear on site plans.

### Request:

5. Please update site plans to show proposed new gas piping tie-ins, to illustrate proposed new below-grade and above-grade alignments and footprints.

**Checklist Section 3.5.15 Fire Prevention and Response.** The Construction Fire Prevention Plan appears as Draft PEA Appendix H. Fire Prevention Practices, in PEA Guidelines, Attachment 4 (p. 84) indicates operation should be within scope: “A *project-specific Construction Fire Prevention Plan for both construction and operation of the project shall be submitted for review prior to initiation of construction.*”

**Request:**

6. Please include a draft version of the Fire Prevention Plan that describes fire prevention and response procedures that would be implemented during operation.

**Checklist Section 3.11 Applicant Proposed Measures.** Measures are provided as project BMP’s.

**Request:**

7. Consider adding measures to minimize potential hazard to the public from the failure of project components as a result of accidents or natural catastrophes, as specified by PEA Checklist Section 5.9.4.4.

## 2.4. Alternatives

**Checklist Section 4.2 No Project Alternative.** The description of the No Project Alternative would be more valuable to the analysis if it were expanded.

**Requests:**

8. The No Project Alternative should describe the range of actions that are reasonably foreseeable if the proposed project is not approved. For example, describe the range of actions needed to address wear and tear on aging infrastructure or to maintain adequate inventory at the La Goleta Storage Field.
9. Address the potential environmental effects of these reasonably foreseeable actions under the No Project Alternative and in the Alternatives Comparison.

**Checklist Section 4.3 Rejected Alternatives.**

**Requests:**

10. In the All-Electric Compression Alternative and 3/1 Hybrid Compression Alternative, please evaluate including natural gas-powered backup generators with each alternative, as backup generators could be permitted to provide the site standby power for reliable operation during loss of site electric power.
11. The description of these alternatives should provide more information on the size and scope of any additional electrical infrastructure including substation and circuits.

## 2.5. Environmental Analysis

*Note: Section numbers correspond with items in the PEA Checklist in the 2019 Pre-filing Guidelines.*

### 2.5.1. Aesthetics

**Aesthetics, Section 5.1.1.5.** The description of viewers and viewer sensitivity does not include feedback from the public about the project.

**Request:**

12. Add descriptions of viewers and viewer sensitivity that incorporates feedback from the public.

**Aesthetics, Section 5.1.1.6.** The representative viewpoints for KOP 1 and KOP 2 do not capture the most-obvious viewing directions. For example, the proposed blowdown stack appears obscured or not at all.

**Request:**

13. Modify the viewpoint from West McFarlane Drive so it directly captures project features.

**Aesthetics, Section 5.1.1.7.** The PEA Checklist indicates that representative photographs should be taken using a digital single-lens reflex camera with standard 50-millimeter lens equivalent, which represents an approximately 40-degree horizontal view angle. Multiple photographs should be provided where project features may be visible in different viewing directions from the same location.

**Request:**

14. Modify the photographs provided or explain why the photographs presented are adequate.

**Aesthetics, Section 5.1.4.3.** The visual simulations of the selected KOPs include the added new facilities in the 'with project' images but did not 'remove' existing structures that are to be taken down after a year of operating the new facility.

**Request:**

15. Correct the simulations to remove the structures that would not be present within a year of new facility operation.

## 2.5.2. Agriculture

**Agriculture, Section 5.2.1.1.** Williamson Act citations are out of date, from 2005. Updated information is available.

**Request:**

16. Update the citations to Williamson Act.

## 2.5.3. Air Quality

**Air Quality, Section 5.3.2.1.**

**Request:**

17. Identify baseline status of the current facility in relation to California's AB 2588 "Hot Spots" Program.

**Air Quality, Section 5.3.4.4.**

**Request:**

18. Disclose the baseline facility health risk prioritization scores in relation to California's AB 2588 "Hot Spots" Program and baseline emissions of air toxics.

## 2.5.4. Biology

**Biological Resources, Section 5.4.1.5.**

**Request:**

19. Sensitive natural communities are included; please move the discussion to Section 5.4.1.3 to be consistent with guidelines.

**Biological Resources, Section 5.4.1.5.**

**Requests:**

20. Habitat assessment and identification should clarify in text the analysis buffer (e.g., 5-mile buffer) for special-status plants and wildlife.

21. Please add discussions of vegetation communities, elevations, seasonal changes; blooming characteristics for plants; breeding and other dispersal (range) behavior for wildlife. Clarify presence of special-status birds, bats, and insects that fly, and the potential to be attracted to the development area.

**Biological Resources, Section 5.4.1.7.**

**Request:**

22. Add mention of regional and local native wildlife nursery sites (or lack thereof) to text to be consistent with guidelines.

**2.5.5. Cultural**

**Requests:**

**Cultural Resources, Section 5.5.1.1.** The Draft PEA Appendix D attaches a draft Built Environment Study.

23. Please provide the final version of the Built Environment Study prepared by Sapphos Environmental, cited as Appendix C of the cultural inventory report.

**Cultural Resources, Section 5.5.1.1.**

24. Please indicate the transect spacing used to conduct the pedestrian survey in the methodology section of the cultural report and in the PEA.

**Cultural Resources, Section 5.5.1.2.**

25. Please indicate the transect spacing used to conduct the pedestrian survey in the methodology section of the cultural report and in the PEA.

**Cultural Resources, Section 5.5.1.2.**

26. Correct a typographic error on p. 5.5-6 regarding the population of Ventura. It has misplaced commas – made the population over a million, rather than approximately 100,000.

**Cultural Resources, Section 5.5.1.3.**

27. Please update Figure 2 in the cultural inventory report to include mileposts along Highway 33.

**Cultural Resources, Section 5.5.1.3.**

28. Please provide confidential record search results information separately.

**Checklist Attachment 3, Cultural Resource Technical Report Standards.**

29. The Cultural Resource Inventory Report should address the requirements of California's "Archaeological Resource Management Reports: Recommended Contents and Guidelines."

**Checklist Attachment 3, Cultural Resource Technical Report Standards.**

30. For archaeological resources, the inventory report should discuss whether each one is also a unique archaeological resource and explain why or why not; and descriptions of resources should include spatial relationships to other nearby resources, raw materials sources, and natural features such as water sources and mountains.

### **2.5.6. Energy**

No comments.

### **2.5.7. Geology, Soils, and Paleontological Resources**

#### **Requests:**

#### **Soils, Section 5.7.1.4.**

31. Include identification of soil types that could be unstable and provide information on the erosion susceptibility for each soil type. The Draft PEA paragraph mentions flat topography minimizes erosive scour; however, PEA Checklist paragraphs (b and c in Section 5.7.1.4) request details on stability and erosion susceptibility for each soil type.

### **2.5.8. Greenhouse Gas Emissions**

#### **Requests:**

#### **GHG, Section 5.8.1.1.**

32. The environmental setting should include an inventory of and consider any GHG emissions from existing infrastructure that would be upgraded or replaced by the project. This should review available information from reports on leaks, leak management practices, and “best estimates” of gas losses previously identified pursuant to SB 1371 requirements.

#### **GHG, Section 5.8.4.3, Natural Gas Storage Accident Conditions.**

33. The Draft PEA (p. 5.8-11) indicates that installation of new components and leak detection with the proposed project should result in fewer natural gas leaks and associated GHG emissions as compared to baseline conditions. To support this statement, please describe the potential for accidental gas leaks in the baseline conditions and identify the potential GHG emissions in the event of a gas leak after development of the proposed project.

#### **GHG, Section 5.8.4.4, Monitoring and Contingency Plan.**

34. Identify the monitoring plan for project operation to monitor for gas leaks; this should identify a monitoring schedule, description of monitoring activities, and actions to be implemented if gas leaks are observed. Include an estimate of the potential for venting natural gas during maintenance activities and what quantities of gas may reasonably be vented during an event and in a typical year.

### **2.5.9. Hazards, Hazardous Materials, Public Safety**

#### **Requests:**

#### **Public Safety, Section 5.9.1.5, Pipeline History.**

35. Disclose site safety and inspection history to establish baseline operational risks. These may be as previously identified and assessed through the CPUC’s Risk Assessment Mitigation Phase (RAMP) process.

**Public Safety, Section 5.9.4.4, Accident or Upset Conditions.**

36. Incident frequency and risk assessment of baseline conditions and conditions at the site with the proposed project should be disclosed. These may be presented through a Quantitative Risk Assessment (QRA) study. Identify and quantify effects of measures to minimize potential hazard to the public from the failure of project components as a result of accidents or natural catastrophes.

**Public Safety, Section 5.9.4.6, Health and Safety Plan and Section 5.9.4.7 Health Risk Assessment.**

37. Include in the Health and Safety Plan (HASP), plans for addressing gas leaks, fires, etc. Identify sensitive receptors, methods of evacuation, and protection measures. The PEA Checklist Section 5.9.4.6 indicates that a Health and Safety Plan should be provided as an Appendix to the PEA; applicant proposes to develop HASP after project approval.

**2.5.10. Hydrology, Water Quality**

No comments.

**2.5.11. Land Use and Planning**

No comments.

**2.5.12. Mineral Resources**

No comments.

**2.5.13. Noise****Requests:**

**Noise, Section 5.13.1.2.** The presentation of existing noise levels includes measurement data in Appendix M of the Draft PEA; however, no description of methodology or plot plan of noise measurement locations appears in the appendix.

38. Please describe the sound level survey methodology, plot the locations of the measurement locations, and identify if any approach is taken to correct for on-site construction work during the measurements.

**Noise, Section 5.13.4.2.**

39. Provide a more detailed table in main text (similar to example in PEA Checklist) showing individual construction equipment noise level, duration, nearest receptor, etc., used in the impact analysis.

**Noise, Section 5.13.4.3.**

40. The PEA Checklist indicates that for existing compressor stations (operated at full load), the PEA should include the results of a sound level survey at the site property line and nearby noise-sensitive areas. Please describe whether the baseline data and sound level survey include operation of the existing compressor station at full load or other operating conditions.

**Noise, Section 5.13.4.3.**

41. Add duration of noise measurements to plot plan with noise measurement locations.

### **2.5.14. Population and Housing**

No comments.

### **2.5.15. Public Services**

No comments.

### **2.5.16. Recreation**

No comments.

### **2.5.17. Transportation**

#### **Requests:**

#### **Transportation, Section 5.17.1.2.**

42. Provide existing traffic volume for each road.

#### **Transportation, Section 5.17.1.3.**

43. Provide frequency of transit services within a half mile of the site.

#### **Transportation, Section 5.17.1.5: Pedestrian Facilities.**

44. Provide more specific identification of pedestrian facilities, including walkways or passenger loading zones, that would be near the project.

#### **Transportation, Section 5.17.4.2.**

45. Provide more detailed information regarding VMT generation for project construction and evaluate project VMT relative to the average VMT for the area.

### **2.5.18. Tribal Cultural Resources**

No comments.

### **2.5.19. Utilities and Service Systems**

**Utilities and Service Systems, Section 5.19.4.3.** Provide estimates of waste material from project.

### **2.5.20. Wildfire**

No comments.

## **2.6. Comparison of Alternatives**

#### **Request:**

#### **Checklist Section 6.1, Alternatives Comparison, Biological Resources.**

46. No wetland delineation report is provided, and no jurisdictional features would be likely in the proposed project development area. However, PEA should describe jurisdictional delineation requirements for project alternatives in Comparison of Alternatives.

## **2.7. Cumulative and Other CEQA Considerations**

### **Request:**

#### **Checklist Section 7.2, Growth-Inducing Impacts.**

47. Consider providing a chart or tables to provide additional detail on the overall demand on the North Coastal System and the forecasted trends in summer-season and winter-season daily demand on the system to illustrate historic changes in demand.

## **2.8. List of Preparers**

No comments.

## **2.9. References**

No comments.