

Governor Gavin Newsom
1303 10th Street, Suite 1173
Sacramento, CA 95814

Dear Governor Newsom,

This letter is on behalf of a coalition of community members, non-profit organizations, and businesses (collectively the, “Westside Clean Air Coalition”) concerned about the environmental impacts of Southern California Gas Company’s (“SoCalGas”) proposal to expand the Ventura Compressor Station (“Gas Expansion Project”), an existing natural gas compressor station located at 1555 N. Olive St. in Ventura, California - *directly across the street from an elementary school.*

The proposed Gas Expansion Project raises significant environmental justice issues. Yet the Ventura County Air Pollution Control District (“Air District”) has thus far refused to review the project and its environmental impacts on the surrounding community under the California Environmental Quality Act (“CEQA”). Accordingly, we urge you to: (1) advise the Air District of its duty to act as lead agency under CEQA, and to prepare an analysis of the Gas Expansion Project’s impacts and propose mitigation measures and alternatives to the project; and (2) remind the California Public Utilities Commission (“CPUC”) of its duty to serve and protect all Californians, including those already bearing a disproportionate burden of environmental harm.

The SoCalGas Ventura Compressor Station is located directly across the street from the Boys and Girls Club of Ventura and less than 500 feet away from E.P. Foster Elementary School, where nearly 400 children go to school, 93% of whom are Hispanic or Latinx, and 89% of whom are socioeconomically disadvantaged. This is a significant contrast from your administration’s recent decision to place a 3,200-foot setback between new oil and gas wells and homes, schools and healthcare facilities. SoCalGas’ compressor station is just a few feet away children and this community who already bear a disproportionate share of environmental pollution and public health hazards. More than 13,000 residents, predominantly low-income and Latinx, live within one mile of the compressor station and the community rates high on several of EPA’s EJ indices (EPA EJscreen tool):

- 77th percentile for PM2.5
- 71st percentile for lifetime cancer risk from inhalation of air toxics
- 68th percentile for air toxics respiratory hazard index risk
- 76th percentile for proximity to sites with a risk management plan (potential chemical accidents)

Expanding the size of this natural gas compressor station, or even continuing to site it across the street from an elementary school as opposed to somewhere else, requires consideration of whether this community is being treated fairly.

Last year, at the height of the pandemic, West Ventura residents received very minimal communication about SoCalGas' plans to expand and increase the capacity of its Ventura compressor station. This is extremely troubling, not only because of the inadequate public notice and lack of opportunity for local community input, but also because of the severe health and environmental impacts that compressor stations of this kind bring. Compressor stations are prone to explosions and can release pollutants into the air. In 2017, NASA found this Ventura compressor site to be a "super emitter" of methane, one of a few sites in California that creates a major portion of the state's emissions. This facility in West Ventura has also had several issues that have led to complaints of odors and evacuations. In fact, during this year's July 4 weekend, community members cited a strong smell of natural gas throughout the area, prompting calls to 911.

Denying the community's right to clean air and a healthy life, while subjecting them to the disproportionate impacts of SoCalGas' toxic pollution from its compressor station, has the potential to create lasting harm for the homes, schools, and community members in the area. West Ventura community members have regularly spoken out about the injustices they are witnessing and experiencing as a result of this toxic compressor station. Residents have attended numerous public meetings and sent hundreds of emails to the city.

Yet to date, neither SoCal Gas nor any relevant government agency has done a comprehensive analysis of the impacts this facility or the proposed expansion will have. Before we expand a dangerous natural gas facility across the street from an elementary school, we should first analyze whether it makes sense to keep it in the middle of a community that already bears a disproportionate share of environmental pollution and public health hazards.

As described in the attached letter, sent to Air District by the Coalition, the Air District is skirting its responsibility to review the Expansion Project under CEQA. The Air District must make a discretionary decision when it approves an Authority to Construct ("ATC") permit for the Gas Expansion Project, thereby triggering its duty to review the project under CEQA. Despite the clear discretion allotted to the Air District in approving the ATC permit, the Air District has taken the position that its decision is ministerial, and therefore it will not review the Expansion Project under CEQA. The Air District's position is legally untenable, and leaves the children attending school across the street, who are overwhelmingly children of color, shouldering even more of the already disproportionate burden of environmental harm.

The California Public Utilities Commission ("CPUC") recently made an informal request that SoCalGas pause its planning and procurement for the Gas Expansion Project until SoCalGas provides the CPUC with information about alternatives and holds a public forum to present the bases for rejecting any alternatives. The CPUC's informal actions stem from its stated position that it has no formal obligation to review the project under CEQA. While the Coalition is not opposed to CPUC's request, it is far from sufficient to protect the interests and health of the surrounding community. Without the formal substantive and procedural protections provided by CEQA, the public and other agencies will be denied the right to ensure SoCalGas imposes all

feasible alternatives or mitigation measures to reduce the project's significant environmental impacts.

In the interest of environmental justice, and to protect those already shouldering a disproportionate amount of environmental hazard, we urge you to advise the Air District of its duty to act as lead agency under CEQA, and to prepare an analysis of the Gas Expansion Project's impacts and propose mitigation measures and alternatives to the project. As California moves towards aggressively addressing the climate crisis and reducing demand for fossil fuels, we know fossil fuel expansion projects, like SoCalGas' Ventura compressor, have no future in our communities and California's climate progress.

In addition, we ask that you remind the CPUC of its obligation to ensure that this ongoing environmental injustice is appropriately addressed, and that our children and our larger community are not jeopardized by SoCalGas' plans to increase their profits at the expense of our health and future. Specifically, the CPUC should reopen and modify the General Rate Case in which it previously approved the Expansion Project without conducting any environmental review. Contrary to the CPUC's own Environmental & Social Justice Action Plan, the Gas Expansion Project would not "[i]ncrease investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health." Moreover, its approval in SoCalGas' previous General Rate Case without any notification to the public or environmental review did not "integrate equity and access considerations" into the CPUC proceeding, nor did it include "outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process."

We have an urgent shared responsibility to protect the environment and communities. We believe Ventura and the state of California can show real environmental justice leadership by recognizing oil and gas infrastructure have no place near homes and schools.

We appreciate your leadership and thank you for your attention to this urgent health and environmental issue.

Sincerely,

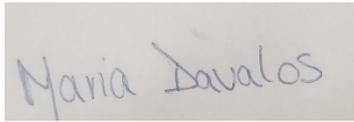


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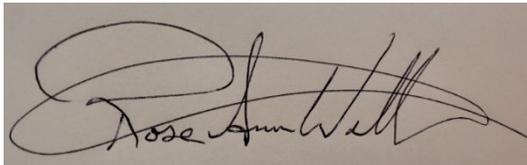


Margot Davis

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Ventura Westside Homeowner &
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Westside Clean Air Coalition

Westside Clean Air

Aire Limpió Para La Avenida



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**RUNNERS FOR
PUBLIC LANDS**