

SECTION 5.17 Natural Gas



5.17 NATURAL GAS

This section addresses the potential impacts of the proposed project with regard to natural gas consumption during construction and operation. The analysis identifies the utility that provides natural gas services to the project site, describes the existing consumption of natural gas at the site, indicates the nature and location of related infrastructure in the local area, and estimates the natural gas demands of the proposed project at buildout.

5.17.1 REGULATORY SETTING

CALIFORNIA NATURAL GAS REGULATION AND INFRASTRUCTURE

The California Public Utilities Commission (CPUC) regulates natural gas utility service for approximately 10.5 million customers that receive natural gas from PG&E, SCGC, SDG&E, Southwest Gas, and several smaller natural gas utilities.¹ Most of California's natural gas customers are residential and small commercial customers (referred to as "core" customers) who accounted for approximately 40 percent of the natural gas delivered by California utilities in 2003.² Large consumers, like electric generators and industrial customers (referred to as "noncore" customers) accounted for approximately 60 percent of the natural gas delivered by California utilities in 2003.³ The CPUC regulates the California utilities' natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering and billing.

Approximately 13.5 percent of California's natural gas is produced in state; the remaining portion of the natural gas supply comes from the Rocky Mountains (23 percent), Canada (23.5 percent), and the Southwest (40 percent).⁴

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The five major interstate pipelines that deliver out-of-state natural gas to California consumers are the Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, and Mojave Pipeline. Another pipeline, the North Baja Pipeline, takes gas off the El Paso Pipeline at the California/Arizona border, and delivers that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, the CPUC often participates in FERC regulatory proceedings to represent the interests of California natural gas consumers.

Most of the natural gas transported via the interstate pipelines, as well as some of the California-produced natural gas, is delivered into the PG&E and SCGC intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" natural gas pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered into the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large non-core customers take natural gas directly off the high-pressure backbone pipeline

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¹ California Public Utilities Commission website, "Natural Gas and California", http://www.cpuc.ca.gov/static/energy/gas/natgasandca.htm (accessed on August 8, 2006).

² Ibid.

³ Ibid.

Summary of the 2007 Integrated Energy Policy Report, California Energy Commission, p.11.



systems, while core customers and other non-core customers take natural gas off the utilities' distribution pipeline systems. The CPUC has regulatory jurisdiction over 100,000 miles of utility-owned natural gas pipelines, which transported 85 percent of the total amount of natural gas delivered to California's gas consumers in 2003.⁵

Some of the natural gas delivered to California customers may be delivered directly to them without being transported over the regulated utility systems. For example, the Kern River/Mojave pipeline system can deliver natural gas directly to some large customers, "bypassing" the utilities' systems. Much of California-produced natural gas is also delivered directly to consumers.

PG&E and SCGC own and operate several natural gas storage fields that are located in northern and southern California. These storage fields, and two independently owned storage utilities – Lodi Gas Storage and Wild Goose Storage – help meet peak seasonal natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently.

California's regulated utilities do not own any natural gas production facilities. All of the natural gas sold by these utilities must be purchased from suppliers and/or marketers. The price of natural gas sold by suppliers and marketers was deregulated by the FERC in the mid-1980s and is determined by "market forces." Prior to the late 1980's, California's regulated utilities provided virtually all natural gas services to natural gas customers. Since then, the CPUC has gradually restructured the natural gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to continue receiving utility-provided services. The CPUC decides whether California's utilities have taken reasonable steps in order to minimize the cost of natural gas purchased on behalf of their core customers.

Although most of California's core customers purchase natural gas directly from the regulated utilities, core customers have the option to purchase natural gas from independent natural gas marketers. Most of California's non-core customers, on the other hand, make natural gas supply arrangements directly with producers or purchase natural gas from marketers.

Another option resulting from the natural gas industry's restructuring process occurred in 1993, when the CPUC removed the utilities' storage service responsibility for non-core customers, along with the cost of this storage service from non-core customers' rates. In 1993, the CPUC also adopted specific storage reservation levels for the utilities' core customers.

In a 1997 decision, the CPUC adopted PG&E's "Gas Accord," which unbundled backbone transmission costs from non-core transportation rates, and gave customers and marketers the opportunity to obtain pipeline capacity rights on PG&E's backbone pipeline system. The Gas Accord also required PG&E to set aside a certain amount of pipeline capacity in order to deliver natural gas to its core customers. In Decision (D.) 03-12-061, issued in December 2003, the CPUC modified and extended the initial terms of the Gas Accord.

In December 2001, the CPUC adopted the "Gas Industry Restructuring" decision (D. 01-12-018). This decision adopted a market and regulatory structure for SCGC similar to the Gas Accord structure for PG&E. In D.04-04-015, the CPUC adopted the tariffs to implement

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⁵ Ibid.



restructuring of the SCGC system, but stayed that decision to consider issues in a major Rulemaking, R.04-01-025.

CALIFORNIA PUBLIC UTILITIES COMMISSION⁶

CPUC General Order 112E, which is based upon the Federal Department of Transportation Guidelines contained in Part 192 of the Federal Code of Regulations, specifies a variety of design, construction, inspection, and notification requirements. The CPUC conducts annual audits of pipeline operations to ensure compliance with the safety standards. Additionally, the SCGC has a safety program which has reduced the risk of gas distribution fires by improving welds on the larger diameter (24- to 30-inch) pipelines and by replacing old distribution pipes with flexible plastic pipes. According to the SCGC staff, high-pressure gas mains are common in developed areas throughout the country, and SCGC lines are inspected regularly and must comply with CPUC mandated safety requirements.

CALIFORNIA ENERGY COMMISSION7

CEC was created as the state's principal energy planning organization in 1974, in order to meet the energy challenges facing the state in response to the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecasting statewide electricity needs;
- Licensing power plants to meet those needs;
- Promoting energy conservation and efficiency measures;
- Developing renewable energy resources and alternative energy technologies;
- Promoting research, development and demonstration; and
- Planning for and directing state response to energy emergencies.⁸

CALIFORNIA BUILDING STANDARDS CODE

California building standards are published in the *California Code of Regulations*, *Title 24*, known as the *California Building Standards Code* (*CBSC*). The *CBSC* applies to all applications for residential building permits. The *CBSC* consists of 11 parts that contain administrative regulations for the California Building Standards Commission and for all State agencies that implement or enforce building standards. Local agencies must ensure that development complies with the guidelines contained in the *CBSC*. Cities and counties have the ability to adopt additional building standards beyond the *CBSC*. *CBSC* Part 2, named the *California Building Code* is based upon the *2009 International Building Code*, and Part 11, named the *California Green Building Standards Code*, and is also called the CalGreen Code. California

braft Program Environmental Impact Report for the City of Santa Clarita's Proposed One Valley One Vision General Plan, Volume I, One Valley One Vision 2010, Section 3.17 Utilities and Infrastructure, Impact Sciences, Inc., September 2010.

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⁸ Summary of the 2007 Integrated Energy Policy Report, California Energy Commission, p.2.



has adopted statewide, mandatory codes based upon the International Code Council's (ICC) Uniform codes. The 2010 California Building Standards Code will adopt the 2009 International codes (I-codes), and take effect January 1, 2011.

CALIFORNIA 2010 GREEN BUILDING STANDARDS CODE - CALGREEN CALIFORNIA CODE OF REGULATIONS TITLE 24, PART 11

The purpose of the *California Green Building Standards Code* is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

- 1. Planning and design;
- 2. Energy efficiency;
- 3. Water efficiency and conservation;
- 4. Material conservation and resource efficiency; and
- 5. Environmental quality

ASSEMBLY BILL 329

In addition to Title 24, the Global Warming Solutions Act of 2006 (AB 32) is anticipated to result in the future regulation of energy resources in California. AB 32 requires California to reduce its carbon footprint to 1990 levels by 2020. In order to achieve these emissions reductions, it is generally accepted that California will need to improve its overall energy efficiency, which includes the use of more renewable energy resources. Pursuant to AB 32, the California Air Resources Board will work with other state agencies (including the CEC), to implement feasible programs and regulations that reduce emissions and improve energy efficiency.

ASSEMBLY BILL 1890¹⁰

The CPUC regulates investor-owned electric power and natural gas utility companies in California. Assembly Bill 1890, enacted in 1996, deregulated the power generation industry, allowing customers to purchase electricity on the open market. Under deregulation, the production and distribution of power that was under the control of investor-owned utilities (SCE) was decoupled. All new construction in the State of California is subject to the energy conservation standards set forth in Title 24, Part 6, Article 2 of the California Administrative Code. These are prescriptive standards that establish maximum energy consumption levels for the heating and cooling of new buildings. The utilization of alternative energy applications in development projects (including the proposed project), while encouraged, is not required as a development condition. Such applications include installation of photovoltaic solar panels, active solar water heating systems, or integrated pool deck water heating systems, all of which serve to displace consumption of conventional energy sources (i.e., electricity and natural gas). Incentives, primarily in the form of state and federal tax credits, as well as reduced energy bills, provide a favorable basis.

10 Ibid.

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⁹ Draft Program Environmental Impact Report for the City of Santa Clarita's Proposed One Valley One Vision General Plan, Volume I, One Valley One Vision 2010, Section 3.17 Utilities and Infrastructure, Impact Sciences, Inc., September 2010.



CITY OF SANTA CLARITA

GENERAL PLAN

Applicable goals, objectives, and policies from the *General Plan Conservation and Open Space Element* are listed below.

Responsible Management of Environmental Systems

Goal CO 1: A balance between the social and economic needs of Santa Clarita Valley residents and protection of the natural environment, so that these needs can be met in the present and in the future.

Objective CO 1.5: Manage urban development and human-built systems to minimize harm to ecosystems, watersheds, and other natural systems, such as urban runoff treatment trains that infiltrate, treat and remove direct connections to impervious areas.

5.17.2 ENVIRONMENTAL SETTING

The majority of the 187.3-acre project site is undeveloped. A 100-foot wide SCGS underground gas transmission pipeline easement is located in the central portion of the site, and is oriented in an east/west direction. This easement is for a 30-inch gas transmission pipeline. In addition, the SCGC operates a three-inch medium pressure gas distribution main on-site in Lost Canyon Road, which terminates at approximately 2,100 feet south of the confluence of Oak Springs Canyon Road. In the project vicinity, the SCGC operates a four-inch medium pressure gas main in Oak Spring Canyon Road, terminating at 262 feet east of the property line on Colhary Court. The transmission and distribution lines in the project vicinity operate a medium pressure of approximately 30 to 60 pounds per square inch (psi).

SOUTHERN CALIFORNIA GAS COMPANY

SCGC is the sole supplier of natural gas to the City and the project site and will continue to expand its distribution facilities and gas lines as development occurs in the area. SCGC operates numerous natural gas pipelines in the City. Service lines range in size from 2- to 34-ince mains. In the eastern potion of the City, two 30-inch gas lines run long the Santa Clara River. In the western portion of the Valley, a 34-inch and a 22-inch main cross the river. Most of the transmission and distribution lines currently serving the City operate at a medium pressure of approximately 30 to 60 pounds per square inch (psi), except for those located within industrial areas where large natural gas users are prevalent and require higher-pressure lines. Currently natural gas is not consumed on-site, since the existing conditions are rural and undeveloped.

Approximately 13.5 percent of California's natural gas is produced in state; the remaining portion of the natural gas supply comes from the Rocky Mountains (23 percent), Canada (23.5

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Written communication with Jack Russo, Planning Associate, Valencia District, Southern California Gas Company, on May 8, 2006.

¹² Ibio

Draft Program Environmental Impact Report for the City of Santa Clarita's Proposed One Valley One Vision General Plan, Volume I, One Valley One Vision 2010, Section 3.17 Utilities and Infrastructure, Impact Sciences, Inc., September 2010.



percent), and the Southwest (40 percent).¹⁴ According to the 2008 California Gas Report, natural gas demand in California is "expected to grow at a modest rate of just 0.1 percent per year from 2008 to 2030.¹⁵ Residential demand is expected to increase at an annual average rate of 0.3 percent, which is half the rate that was projected in the 2006 California Gas Report.¹⁶ As provided in the 2008 California Gas Report, the state is projected to have adequate natural gas resources to meet the statewide demand during the 2008-2030 time frame.

According to the CEC, SCGC provided approximately 790.3 billion cubic feet (bcf) of natural gas to its customers in 2009.¹⁷ By 2016, annual natural gas deliveries to SCGC customers are expected to increase to approximately 792.4 bcf per year.¹⁸

5.17.3 SIGNIFICANCE THRESHOLD CRITERIA

The City of Santa Clarita Local CEQA Guidelines (Resolution 05-38) adopted on April 26, 2005 and the Initial Study Environmental Checklist form in CEQA Guidelines Appendix G serve as the thresholds for determining the significance of impacts relating to natural gas services. As such, a project would be considered to have a significant environmental impact if it would result in following:

- The project would create demands on natural gas supply and infrastructure which exceed the capacity of the utility serving the project site.
- The project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (including, but not limited to oil, pesticides, chemicals, fuels, or radiaton).

Based on these standards, the effects of the proposed project have been categorized as either a "less than significant impact" or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact.

5.17.4 PROJECT IMPACTS AND MITIGATION MEASURES

• DEVELOPMENT OF THE PROPOSED PROJECT WOULD INCREASE DEMANDS ON NATURAL GAS SUPPLIES AND DISTRIBUTION INFRASTRUCTURE.

Level of Significance Before Analysis and Mitigation: Less Than Significant Impact.

Impact Analysis: The project site is currently undeveloped and no natural gas distribution line infrastructure exists or is consumed on-site.

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¹⁴ Summary of the 2007 Integrated Energy Policy Report, California Energy Commission, p.11.

Landmark Village Recirculated EIR, County of Los Angeles, November 2008.

¹⁶ Ibid

California Energy Commission, California Energy Demand 2006-2016 Staff Energy Demand Forecast Revised September 2005. Staff Final Report. Publication #CEC-400-2005-034-SF-ED2. September 2005.

¹⁸ Ibid.



In order to provide a conservative analysis, the demand for natural gas of the proposed project has been compared to the demand for 2009 and the projected future demand for 2016. SCGC is the sole supplier of natural gas to the City and will continue to expand its distribution facilities and gas lines as development occurs in the area. According to the CEC as mentioned above, SCGC provided approximately 790.3 bcf of natural gas to its customers in 2009. By 2016, annual natural gas deliveries to SCGC customers are expected to increase to approximately 792.4 bcf per year. Based upon a consumption factor of 6,665 cubic feet per single family dwelling unit per month (cf/du/month), buildout of the proposed project would demand approximately 8,238 thousand cubic feet (kcf) per year (659,835 cf/month x 12 months) of natural gas, which would only total which would only total 0.001 percent of the provided natural gas in 2009 (8,238 kcf out of 790.3 bcf) and 0.001 one percent of the projected natural gas in 2016 (8,238 kcf out of 792.4 bcf).

According to the 2008 California Gas Report, natural gas demand in California is "expected to grow at a modest rate of just 0.1 percent per year from 2008 to 2030.²¹ Residential demand is expected to increase at an annual average rate of 0.3 percent, which is one-half the rate that was projected in the 2006 California Gas Report.²² As provided in the 2008 California Gas Report, the State is projected to have adequate natural gas resources to meet the statewide demand during the 2008-2030 time frame.

Local on-site natural gas distribution pipelines would be installed and connected to either one or both of the medium gas distribution mains that serve the project site, at the expense of the project applicant. The local on-site distribution mains would serve the proposed residential units. No other improvements related to natural gas are necessary.

Although the proposed project would create additional demands on natural gas supplies and distribution infrastructure, these demands are well within the service capabilities of SCGC. In addition, the proposed project would be required to comply with Title 24 and the California 2010 Green Building Standards Code. Thus, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

Level of Significance After Analysis and Mitigation: Less Than Significant Impact.

 DEVELOPMENT OF THE PROPOSED PROJECT COULD CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT.

Level of Significance Before Analysis and Mitigation: Potentially Significant Impact.

Impact Analysis: A 100-foot wide SCGS underground gas transmission pipeline easement with a 30-inch gas transmission pipeline is located in the central portion of the project site, and is oriented in an east/west direction. The transmission lines in the project vicinity operate a

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California Energy Commission, California Energy Demand 2006-2016 Staff Energy Demand Forecast Revised September 2005. Staff Final Report. Publication #CEC-400-2005-034-SF-ED2. September 2005.

²⁰ Ibid

²¹ Landmark Village Recirculated EIR, County of Los Angeles, November 2008.

²² Ibid



medium pressure of approximately 30 to 60 pounds per square inch (psi). The SCGS is required to comply with the Department of Transportation (DOT) *Code of Federal Regulations* 49 Part 192.327, which establishes minimum cover requirements at 30 inches for transmission pipelines in Class 1, and 36 inches in Classes 2, 3, and 4.

The potential types of transmission pipeline incidents include the following:²³

- Third Party Damage (i.e., third party damage, vandalism)
- Corrosion Related
- Miscellaneous Equipment and Pipe Failure or Buckle
- Incorrect Operations or Procedures
- Weather Related
- Unknown
- Manufacturing Related Defects
- Welding/Fabrication Related
- Outside Forces (i.e., earth moving)
- Environmental Cracking (i.e., stress corrosion cracking)

The greatest risk for injury and fatality occurs with a leak or unintentional release of natural gas. Natural gas is composed primarily of methane. If methane were to be released transmission pipeline, it would need to mix with enough oxygen to become combustible. Natural gas does not explode unless it is confined sufficiently within a specific range of mixtures with air and is ignited. The most frequent causes of incidents include corrosion and outside forces. Outside forces include impact by mechanical equipment, such as bulldozers and backhoes; earth movements due to soil settlement, washouts, or geological hazards; weather effects, such as winds, storms, and thermal strains; and willful damage.

The proposed project would maintain the 100-foot wide easement under "D" Street and between Lots 77and 78 on Mancara Road. "D" Street is proposed to consist of a two-lane undivided roadway with a 64-foot ROW. A total of 18 lots along "D" Street would be located adjacent to the easement: Lot 88 to 97 on the north side of the street, and Lots 87, 63, 62, 52, 51, 32, 31, and 1 on the south side of the street. The easement would extend into all 20 lots previously mentioned on "D" Street and Mancara Road. Both the RVL and RL zoning designations require a minimum 20-foot front, 5-foot side, 20-foot side (reverse corner lot), and 15-foot rear setback.

There is the potential for transmission pipelines incidents during both construction and operation of the proposed project. However, this potential can be minimized during construction with compliance with *UDC* Chapter 13, specifically Chapter 13.18, Excavations and Encroachments, along with Mitigation Measure NG-1.

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²³ Source: Page 11, Topical Report, Natural Gas Transmission Pipelines Pipeline Integrity, Prevention, Detection & Mitigation Practices, prepared for The Hartford Steam Boiler Inspection And Insurance Company, December 2000.



The potential can be minimized during the final site design and operation with the consideration of additional setback or specialized requirements that provide additional assurances to limit any disruption within the transmission pipeline easement or to the transmission pipeline. The City of Santa Clarita may want to explore specifying a minimum standard for separating development from the pipeline, as well as limiting what the property owner may do with his/her property. Examples include:²⁴

- Place limits on construction or excavation that involve separating activities such as planting of trees or digging foundations some number of feet from the pipeline.
- Setbacks of 50 feet from petroleum and hazardous liquids lines for new homes, businesses, and places of public assembly.
- Setbacks of 25 feet for garden sheds and 10 feet for mailboxes and yard lights.

Mitigation Measure NG-2 expands upon the examples above by having the project applicant work with the City of Santa Clarita and SCGC to develop additional requirements that would be applicable during site design and homeowner occupation to further reduce the potential.

The potential during operation is further minimized by disclosing to all buyers the location of the SCGC transmission pipeline and easement (Mitigation Measure NG-3) and by calling 811 to know what's below the ground before any digging or construction begins (Mitigation Measure NG-4).

In conjunction, Mitigation Measures NG-1 through NG-4 would be implemented through all phases of the proposed project (final design, construction, and operation) with the responsibility falling upon all responsible parties, including the project applicant, construction contractor, SCGC, City of Santa Clarita, and the homeowner, and would reduce impacts to a less than significant level.

Mitigation Measures:

- NG-1 The project applicant/and construction contractor shall comply with all Southern California Gas Company requirements for pre-construction, construction, and operation. Proof of compliance shall be provided to the City of Santa Clarita and the Southern California Gas Company.
- NG-2 The project applicant shall work with the City of Santa Clarita and the Southern California Gas Company to determine if additional setbacks or parcel-specific standards beyond the Unified Development Code from the transmission pipeline easement are necessary to further improve resident safety. If additional standards are agreed upon by all three parties, the standards shall be shown on the final tract map and/or included in the proposed project's Homeowner's Association (HOA) Covenants, Conditions, and Restrictions (CC&Rs).

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Source: Setbacks And Zoning For Natural Gas And Hazardous Liquid Transmission Pipelines, prepared by Jim Doherty, Legal Consultant For Municipal Research & Services Center, Seattle, August 2004.



- NG-3 As part of the sale of individual properties, the project applicant/developer shall disclose to all buyers of Tract 063022 the location of the SCGC transmission pipeline easement.
- NG-4 The project applicant, construction contract or individual property owners must call Underground Service Alert (USA) by dialing 811 at least two working days in advance of any underground digging work. USA provides a free service for marking underground utilities prior to digging.

Level of Significance After Analysis and Mitigation: Less Than Significant Impact.

5.17.5 CUMULATIVE IMPACTS AND MITIGATION MEASURES

 DEVELOPMENT ASSOCIATED WITH THE PROPOSED PROJECT AND OTHER RELATED CUMULATIVE PROJECTS IN THE SANTA CLARITA VALLEY, WOULD INCREMENTALLY INCREASE DEMANDS ON NATURAL GAS SUPPLIES AND DISTRIBUTION INFRASTRUCTURE.

Level of Significance Before Analysis and Mitigation: Less Than Significant Impact.

Impact Analysis: In relation to the cumulative development outlined in <u>Section 4.0</u>, <u>Basis of Cumulative Analysis</u>, the proposed project would cumulatively contribute to an increased demand for natural gas utilities. Development associated with the proposed project and related cumulative projects would result in the consumption of approximately 84,121 kcf of natural gas per month (refer to Appendix C, Cumulative Growth Calculations), or approximately 1,009,452 kcf per year. According to the CEC as mentioned above, SCGC provided approximately 790.3 bcf of natural gas to its customers in 2009.²⁵ By 2016, annual natural gas deliveries to SCGC customers are expected to increase to approximately 792.4 bcf per year.²⁶ Buildout of the proposed project and related cumulative projects would demand approximately 84,121 kcf of natural gas per month or approximately 1,009,452 kcf per year, which would only total which would only total approximately 0.01 percent of the provided natural gas in 2009 (84,121 kcf out of 790.3 bcf) and less than 0.01 percent of the projected natural gas in 2016 (84,121 kcf out of 792.4 bcf).

Where necessary, natural gas distribution pipelines would be installed to serve development associated with the proposed project and related projects at the expense of the project applicants. Although the proposed project and related projects would create additional demands on natural gas supplies and distribution infrastructure, these demands are well within the service capabilities of SCGC. In addition, the proposed project and related cumulative projects would be required to comply with Title 24 and the California 2010 Green Building Standards Code. As such, cumulative impacts would be less than significant.

26 Ibid.

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California Energy Commission, California Energy Demand 2006-2016 Staff Energy Demand Forecast Revised September 2005. Staff Final Report. Publication #CEC-400-2005-034-SF-ED2. September 2005.



Mitigation Measures: No mitigation measures are required.

Level of Significance After Analysis and Mitigation: Less Than Significant Impact.

5.17.6 SIGNIFICANT UNAVOIDABLE IMPACTS

All potentially significant impacts related to natural gas services are at less than significant levels, or can be mitigated to less than significant levels. As such, implementation of the proposed project would not result in any significant unavoidable natural gas services impacts.

5.17.7 SOURCES CITED

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