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October 7, 2013

Mr. Ron Tippets
Orange County Public Works/Planning Services
300 N. Flower Street
Santa Ana, CA 92702-4048

Re: The Preserve at San Juan (PA130026)

Dear Mr. Tippets:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Notice of Intent (NOI) to Prepare a Draft Environmental Impact Report (EIR) for the subject project. We respectfully request that the following comments be addressed in the project's draft EIR.

SoCalGas recommends that the draft EIR include a detailed discussion of activities associated with any extension of new natural gas service. At present, there is only a brief statement indicating that the project would develop the associated utility infrastructure to service the new residential uses. The recommended additional discussion should include:

- The presence and condition of existing utility infrastructure on the project site, including right-of-ways and/or easements.
- The number and description of any new natural gas facilities that will have to be constructed or installed, in order to provide natural gas service to the proposed project.
- Identification and description of any temporary areas required for construction and/or staging of material related to new gas service construction.
- Identification of any actions that would require permitting or acquisition of new right-ofway or easements for natural gas service to the project.
- Any proposed grading and/or drainage improvements that would redirect drainage in a manner that would increase the potential for erosion around SoCalGas facilities.

The draft EIR should also recognize that, in order to provide service, natural gas lines may have to be extended from existing off-site locations to the project site. A discussion of these issues

with appropriate diagrams, including specific environmental impact analyses related to these activities, if necessary, may help to reduce the time and cost associated with the extension of new natural gas service to the project.

In addition, if any field monitoring for cultural or biological resources is required during construction of the natural gas facilities, the monitoring should be mentioned in the draft EIR as a requirement and responsibility of the ("larger") Preserve at San Juan development project. Likewise, any environmental mitigation required for the potential impacts associated with the construction of gas service to the project should also be addressed as part of the responsibility of the development project.

Once again, we appreciate the opportunity to comment on the NOI. If you have any questions, please feel free to contact me at (213) 244-4339 or aklecha@semprautilities.com.

Sincerely,

Anthony A. Klecha

Principal Environmental Specialist Southern California Gas Company