

COUNTY OF VENTURA
PLANNING COMMISSION HEARING
CASE NO. PL23 - 0113
PUBLIC COMMENTS RECEIVED FOR DECEMBER 7, 2023,
PLANNING COMMISSION MEETING

Juachon, Luz

From: Oil and Gas Ordinance
Subject: FW: PI230113

From: Margot Davis <wally97@hotmail.com>
Sent: Saturday, November 25, 2023 3:55 PM
To: Sussman, Shelley <Shelley.Sussman@ventura.org>
Subject: PI230113

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Do not approve and pass these amendments which are NOT in the interest of your constituents (human beings and other living things in ventura county) and are a shameful sellout to the fossil fuel industry. Wake up to 2023 and beyond. Don't settle the lawsuit. Big oil will lose and pay all attorney fees.

Margot Davis
148 west simpson
Westside clean air coalition

Sent from Margot's iPad

Juachon, Luz

From: Jayne Turcotte <jayneturcotte92@gmail.com>
Sent: Monday, December 4, 2023 7:54 PM
To: Sussman, Shelley
Subject: agenda item 6A

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Dear Supervisors,
Please consider the health of our communities. Do not allow Big Oil and Gas to weaken the county's environmental protections by inserting "if feasible" into the regulations. This creates a huge loophole and the companies will drive right through it. We know they do not care about our health, but that is your job as supervisors. This change will have negative effects on our planet as well. We need to take any and all steps to slow down climate change, and making it easier for gas companies to flare extra gas will do the opposite. As will allowing diesel oil trucking to increase. Please do the right thing and vote no on item 6A.

Sincerely,

Jayne Turcotte
3515 Mound Avenue
Ventura Ca 93003

Juachon, Luz

From: Alana Sheeren <alanasheeren@gmail.com>
Sent: Monday, December 4, 2023 8:05 PM
To: Sussman, Shelley
Subject: Agenda Item 6.A

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Members of the Board of Supervisors,

As a Ventura resident, business person and parent, I am disappointed and angry that you are considering giving oil companies an "out" to circumvent important health and climate safeguards in their permitting process. It's past time to stop allowing them to pollute our communities and harm our residents, especially those in low-income areas and areas populated mostly by communities of color. This is called environmental racism.

It is vital that IF you are to include the unfortunate word "feasible" in the oil & gas permitting policy, the permitting procedure require documentation and examination by a third-party to determine feasibility. The oil and gas companies should in no way be allowed to police themselves. They have shown themselves again and again to be untrustworthy when it comes to environmental regulations or doing what's right for anyone other than their CEOs and shareholders. Every time, they choose profits over people and shame on you if you do the same.

It is imperative that Ventura County ensure that each individual oil and gas permit is reviewed and compliant. The health and safety of our community and its residents are depending on it.

I urge you to make the decision that will put you on the correct side of history and morality. People should be valued over profits, always.

Alana Sheeren

From: jim yarbrough <jyarbro2003@yahoo.com>
Sent: Monday, December 4, 2023 8:14 PM
To: Sussman, Shelley
Subject: Agenda Item 6.A, County Supervisor's Board Meeting of December 7, 2023

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- In the June 1, 2023 Planning Commission hearing, during a conversation about building electrification ordinances, Commissioner Sandlin (District 2) [stated](#): “I’d love to see some analysis of what’s feasible and what’s not feasible, as you mentioned, by putting that word [feasible] in there, it does give an out. [...] If there is “feasible” language in there, it looks like there would be an out to getting things done.” With this sound logic, Ventura County is providing “an out” to oil companies to continue polluting our communities.
- [Several studies](#) demonstrate that flaring produces carbon monoxide, nitrogen oxides, particulate matter, and volatile organic compounds; these are all pollutants that have an *unambiguously negative impact on human health*. The communities most impacted by oil and gas drilling in Ventura County are low-income and communities of color and these negative health impacts are a case of environmental racism. For example, active flares on the Oxnard Plain are located near Oxnard Pacific Mobile Homes and Nyland Acres, with [pollution burdens](#) 94 and 78 percent higher than the rest of CA).
- Community members across Oxnard have been fighting for clean air for years and are overburdened with large diesel trucks polluting their neighborhoods. The tiny particles of pollution in diesel exhaust, which often include toxic metals and chemicals, can lodge deep in the [lungs and cause irritation](#). In addition to causing short-term problems like coughing, headaches, and nausea, diesel exhaust can damage both the lungs and the heart, and has been linked to very serious health problems.
- These amendments will increase the pollution emissions of methane (from flaring) and nitrogen oxides (from diesel trucking). Both of these pollutants are greenhouse gases with significant climate-warming capabilities. In the [fastest-warming county](#) in the contiguous United States, we must decrease our emissions to protect our future.



- The County cannot just take an oil company's word on what is feasible or not, **a permitting procedure to require documentation and third-party review of feasibility must be implemented.**
- **The County must commit and follow through with their discretionary decision-making power to ensure that each individual oil and gas permit is reviewed and compliant.** These amendments do not give the decision-making power to oil operators, but do make it even more important that the County thoughtfully analyze each permit. The health and safety of our community depends on it.

Jim Yarbrough Newbury Park, CA 91320 (for i.d. purposes only, 4102 Greenwood Street)

Juachon, Luz

From: Ann Dorsey <aedorsey@hotmail.com>
Sent: Monday, December 4, 2023 8:17 PM
To: Sussman, Shelley
Subject: Agenda Item 6.A

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I urge the Ventura County Board of Supervisors to do everything they can to protect the health and well-being of the communities impacted by oil and gas operations. Adding “if feasible” to regulations would make them unenforceable and needs to be avoided.

If the wording has to be added, it will be especially important that the County not take an oil company’s word regarding what is feasible. A permitting procedure to require documentation and third-party review of feasibility must be implemented.

Also, the County must thoughtfully analyze every permit and follow through with their discretionary decision-making power to ensure it is reviewed and compliant.

Thank you,

Ann Dorsey

From: Ruth Cooper <ruthcoopermft@gmail.com>
Sent: Monday, December 4, 2023 9:02 PM
To: Sussman, Shelley <Shelley.Sussman@ventura.org>
Subject: Agenda item 6.A

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Dear Planning Commissioners and Staff,

I am writing to implore you to not include feasibility language in the General Plan as it pertains to the flaring of methane gas. This would be contrary to the mission of the County of Ventura, which is "to provide superior public service and support so that all residents have the opportunity to improve their quality of life while enjoying the benefits of a safe, healthy, and vibrant community." Flaring produces carbon monoxide, nitrogen oxides, particulate matter, and volatile organic compounds; these are all pollutants that have an *unambiguously negative impact on human health*. The communities most impacted by oil and gas drilling in Ventura County are low-income and communities of color. For example, active flares on the Oxnard Plain are located near Oxnard Pacific Mobile Homes and Nyland Acres, with [pollution burdens](#) 94 and 78 percent higher than the rest of CA.

The World Bank has launched an initiative to encourage all oil and gas companies to adopt zero routine flaring (ZRF) by 2030. Many oil and gas companies have already adopted ZRF policies.* Oil companies can avoid flaring of gas during hydraulic fracturing by implementing a variety of measures, including:

- Developing and investing in infrastructure to capture and utilize associated gas. This includes building pipelines to transport gas to market, constructing processing facilities to remove impurities and make the gas usable, and investing in gas-fired power plants or other industrial facilities that can use the gas as fuel.
- Utilizing on-site gas utilization technologies. These technologies can be used to process and use associated gas directly at the well site, eliminating the need to flare it. Examples of on-site gas utilization technologies include gas turbines, microturbines, and reciprocating engines.
- Implementing leak detection and repair (LDAR) programs. LDAR programs can help identify and repair leaks in oil and gas infrastructure, preventing gas from escaping into the atmosphere.
- In addition to these technical measures, oil companies should disclose their flaring data and make it publicly available.

* <https://www.worldbank.org/en/programs/zero-routine-flaring-by-2030/endorsers>

Sincerely,

Ruth Cooper
818 Sunset Pl
Ojai, CA 93023

Juachon, Luz

From: Ruth Cooper <ruthcoopermft@gmail.com>
Sent: Tuesday, December 5, 2023 10:08 AM
To: Sussman, Shelley
Subject: Agenda item 6.0

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to Email.Security@ventura.org.

Dear Planning Commissioners and Staff,

Every day I check the air quality in the areas where I live and work--Ojai and Ventura respectively. And day after day the air quality in the city of Ventura is rated "poor", despite it looking like a clear day. Frequently this is due to the high levels of NO₂, one of the chemicals that come from the flaring of methane and from diesel fumes. Please don't change the General Plan to include feasibility language. The health and wellness of the citizens of this County deserve clean air.

Sincerely,

Ruth Cooper
818 Sunset Pl, Ojai, CA 93023

Juachon, Luz

From: Rose M Berger <rbergersol@gmail.com>
Sent: Tuesday, December 5, 2023 3:16 PM
To: Sussman, Shelley
Subject: Agenda Item 6.A

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Dear Ms. Sussman and members of the Ventura County Planning Commission:

This is a public comment in regard to agenda item 6A at your meeting on Dec. 7 to consider two [amendments to oil and gas policies](#) in the Ventura County 2040 General Plan.

Policy COS-7.7 and 7.8 should NOT be amended.

The policies' language should remain as they are. The original language represents the will of the people of Ventura County. Oil and gas companies operating in Ventura County do not need to be given "flexibility." They should not be allowed to determine what is "feasible" or not. If they want to continue to operate in the county then they will abide by the original language. The people of Ventura County have already determined how we want these companies to conduct business in this county. I ask that you vote NO on the proposed amendments to Policy COS-7.7 and Policy COS-7.8.

The Ventura County Planning Commission must commit and follow through with their discretionary decision-making power to ensure that each individual oil and gas permit is reviewed and compliant without allowing oil and gas companies to determine "feasibility."

Thank you for your public service.

Rose Berger
682 Spring Street, Oak View, Ventura County, Calif.

Juachon, Luz

From: Ched Myers <chedmyers@bcm-net.org>
Sent: Tuesday, December 5, 2023 4:34 PM
To: Sussman, Shelley
Cc: Elaine Enns
Subject: FW: Agenda Item 6.A

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to Email.Security@ventura.org.

Dear Ms. Sussman and members of the Ventura County Planning Commission:

This is a public comment in regard to agenda item 6A at your meeting on Dec. 7 to consider two [amendments to oil and gas policies](#) in the Ventura County 2040 General Plan.

Policy COS-7.7 and 7.8 should NOT be amended.

The policies' language should remain as they are. The original language represents the will of the people of Ventura County, which oil and gas companies operating in Ventura County seek to compromise. They should not be allowed to determine what is "feasible" or not. If they want to continue to operate in the county then they will abide by the original language. The people of Ventura County have already determined how we want these companies to conduct business in this county, taking into account the challenges of the climate crisis that is upon us. We citizens must take the lead in adopting responsible environmental legislation.

Please vote NO on the proposed amendments to Policy COS-7.7 and Policy COS-7.8.

The Ventura County Planning Commission must commit and follow through with their discretionary decision-making power to ensure that each individual oil and gas permit is reviewed and compliant without allowing oil and gas companies to determine "feasibility."

Thank you.

Charles Myers and Elaine Enns, Oak View

PO Box 328, Oak View, CA 93022 805-836-1227

We live and work on unceded and untreated Chumash territory in the Ventura River Watershed.

--

Rose Marie Berger
Ojai Valley, California
Traditional Chumash territory
Ventura River watershed
www.rosemarieberger.com

Juachon, Luz

From: Barbara Leighton <beleighton@yahoo.com>
Sent: Tuesday, December 5, 2023 5:07 PM
To: Sussman, Shelley
Cc: Gordon Clint
Subject: Agenda Item 6.A

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Dear Supervisors:

In 2020, the Ventura County Board of Supervisors passed the [2040 General Plan](#) after extensive public input to encourage measures that **protect the health and safety of our residents**.

In 2022, oil interests spent over \$7million in our local election to narrowly defeat measures A&B, that would have required restarting old wells to meet current standards for health and safety.

Now, the Board is considering adding "if feasible" to health and safety measures of the 2040 General Plan regarding policies that ban the flaring of excess fracked gas, and limit diesel oil trucking by requiring pipelines. These policies were adopted to mitigate damaging impacts on residents now and into the future.

What does "if feasible" even mean? Could it be: "if you like," or "if no costs are involved," or "if you're not willing to change a business model that dumps harmful externalities on innocent people?"

Please do not adopt "if feasible" language and vote in favor of health and safety for residents in Ventura County.

Sincerely,
Barbara Leighton & Gordon Clint

4102 Greenwood St.
Newbury Park, CA 91320

Juachon, Luz

From: Haley Ehlers <haley@cfrog.org>
Sent: Tuesday, December 5, 2023 5:44 PM
To: Sussman, Shelley
Subject: Agenda Item 6.A
Attachments: CFROG Comment_Agenda 6.A_120723.pdf

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Hi Shelley,

Please find the attached comment letter from Climate First: Replacing Oil & Gas (CFROG) for Agenda Item 6.A on the Planning Commission Hearing on 12/7/23. We appreciate your and the Planning Commission's review and consideration.

Thank you,
Haley Ehlers

--

Haley Ehlers (she/her)
Executive Director
CFROG - Climate First: Replacing Oil & Gas
(805)263-7408 | haley@cfrog.org
www.cfrog.org



December 5, 2023

Ventura County Planning Commission
Sent via email shelley.sussman@ventura.org

Re: Agenda Item 6.A

Dear Commissioners,

Climate First: Replacing Oil & Gas (CFROG) is a grassroots environmental nonprofit dedicated to combating the climate crisis by working to shape the transition away from fossil fuels to a carbon-free economy in Ventura County. During the multi-year General Plan Update process, CFROG worked with community members to advocate for bold climate action and ensure community voices were being heard and reflected in the plan that would guide our community for the next 20 years. We are proud, and hope you are too, that this led to a precedent-setting General Plan, including some of the first policies to protect community health and safety from oil drilling in the nation.

As you consider amendments to these policies as a result of a settlement between the County of Ventura and the oil industry, we urge you to (1) recognize the full environmental impacts, (2) clarify the operator's burden of proof to claim infeasibility with documentation, and (3) endorse the limits on economic infeasibility when any new permit is being considered.

The Staff Report and CEQA Addendum downplay the environmental impacts of the amendments. The original EIR for the General Plan determined that the benefits to human health and the environment from adopting the trucking and flaring policies without weakening them via a feasibility exception outweighed any effects on mineral and petroleum resources, especially benefits related to air quality, greenhouse gas emissions reduction, vehicle miles traveled, and traffic safety. We are disappointed that the Staff Report and CEQA Addendum now conclude that "the potential economic, environmental and other implications of the proposed General Plan amendments would be speculative and marginal at most" because the trucking and flaring policies only apply to new discretionary wells. The fact that new discretionary wells are a subset of all wells drilled in the County does not change the original EIR's conclusion that when such wells are drilled, their impacts to human health and the environment will be substantial. Even one new well where the operator successfully claims a feasibility exemption will have negative impacts on the surrounding community.

The Staff Report section of General Plan consistency properly recognizes that the feasibility exception could reduce the attainment of principles and policies concerning –

1. the minimization of health and safety impacts to residents, businesses and, visitors from human-cause hazards;
2. the reduction of greenhouse gas emissions; and
3. environmental justice – defined as, 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.”

Several studies¹ demonstrate that flaring produces carbon monoxide, nitrogen oxides, particulate matter, and volatile organic compounds; these are all pollutants that have an unambiguously negative impact on human health. The communities most impacted by oil and gas drilling in Ventura County are low-income and communities of color and these negative health impacts are a case of environmental racism. For example, active flares on the Oxnard Plain are located near Oxnard Pacific Mobile Homes and Nyland Acres, with pollution burdens 94 and 78 percent higher than the rest of CA.²

Community members across Oxnard have been fighting for clean air for years and are overburdened with large diesel trucks polluting their neighborhoods. The tiny particles of pollution in diesel exhaust, which often include toxic metals and chemicals, can lodge deep in the lungs and cause irritation.³ In addition to causing short-term problems like coughing, headaches, and nausea, breaking diesel exhaust can damage both the lungs and the heart, and has been linked to very serious health problems.

The County must acknowledge and clarify the operator’s burden of proof. We appreciate that the feasibility exception will only be allowed “if the proponent demonstrates” infeasibility to the County’s satisfaction. This wording properly places the burden of proof on operators to provide evidence of infeasibility rather than allowing oil companies to rely on unsupported claims. We expect the County to thoroughly vet infeasibility claims on a case-by-case basis, based on the particular facts and circumstances of each site, rather than rubber-stamping permit applications. The County should **explicitly require operators to submit written materials sufficient to prove any claims of infeasibility.** The County must critically assess the evidence provided through an open and public process that enables independent experts to review and evaluate any such claims.

¹ Wesley Blundell, Anatolii Kokoza, Natural gas flaring, respiratory health, and distributional effects, Journal of Public Economics, Volume 208, 2022.

² CalEnviroScreen 4.0

³ <https://www.momscleanairforce.org/resources/how-diesel-pollution-affects-your-health/>

In the June 1, 2023, Planning Commission hearing, during a conversation about building electrification ordinances, Commissioner Sandlin stated: “I’d love to see some analysis of what’s feasible and what’s not feasible, as you mentioned, by putting the word [feasible] in there, it does give an out. [...] If there is “feasible” language in there, it looks like there would be an out to getting things done.”⁴ With this sound logic, Ventura County is providing “an out” to oil companies to continue polluting our communities. The County should follow Commissioner Sandlin’s sound logic by ensuring that each claim of infeasibility is analyzed and includes written documentation.

The County must endorse the limits on claims of economic infeasibility. We note that the General Plan’s definition of feasibility is identical to the definition in section 15364 of the CEQA Guidelines. When making a case-by-base determination on feasibility, our expectation is that the County will follow feasibility principles from CEQA case law, including the following three limits:

1. First, the fact that piping oil or containing gases “may be more expensive or less profitable” than trucking/flaring should be insufficient to show that compliance is financially infeasible. Instead, the County should require “evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1181.
2. Second, the County should apply an objective test to evaluate claims that compliance with limitations on trucking, flaring, or venting is “infeasible.” Under this test, the County should consider whether the marginal costs of compliance “are so great that a reasonably prudent [person] would not proceed” with the extraction activities if required to comply. *Sustainability, Parks, Recycling & Wildlife Legal Defense Fund v. San Francisco Bay Conservation & Development Com.* (2014) 226 Cal.App.4th 905, 918, as modified (June 25, 2014).
3. Third, feasibility decisions should be made without regard to an operator’s individual financial status. *Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 599–600.

Community members across Ventura County are disappointed, saddened, and frustrated that the progress we made together to protect community health and climate has been dampened by oil and gas industry tactics – from multiple lawsuits, a settlement, and a 7 million dollar referendum campaign. The County of Ventura must do better to protect our community, especially those most vulnerable, and our future.

With urgency,



Haley Ehlers, Executive Director

⁴ <https://www.youtube.com/live/BvFqA7PvHgQ?si=tut9UvAhnJqEcRa&t=3282>

Juachon, Luz

From: kay <kay56094@gmail.com>
Sent: Wednesday, December 6, 2023 8:21 AM
To: Sussman, Shelley
Subject: Agenda Item 6.A

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The people of Ventura County have spoken very clearly when they voted have 2040 General Plan implemented. Messages from these points which are supported by CA Attorney General and County Council are the CONTINUED need for STRONG guard rails on the Oil Companies as they CONTINUE to use loop holes that are present to their advantage and continue to pollute. The newest Board of Supervisors have weakened health and climate laws by going into a settlement agreement with the oil industry. By continuing to settle Ventura County is backing down to the oil industry which has proven to exploit and profit off our resources. This is NOT what THE PEOPLE voted in. Just because there is a new Board of Supervisors should not change what the majority of people in Ventura County voted for. Lets go BACK to original intent of this and add 'if feasible' to the policies protecting communities from harmful air pollution. Put teeth in the words of 'new wells'. STAND BY THE ORIGINAL GENERAL PLAN of 2040—not be manipulated by unfettered use of OUR resources and greed.

Katharine S Simmons
Sent from [Mail](#) for Windows

Juachon, Luz

From: Phil White <philbranco@gmail.com>
Sent: Wednesday, December 6, 2023 2:30 PM
To: Sussman, Shelley
Subject: Item 6a - Phil White comments

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Dear Commissioners

In 2020, the Planning Commission recommended that the Board of Supervisors adopt a package of policies and programs into the 2040 General Plan.

An important part of that recommended package, which the Board approved in September, 2020, was a new Climate Action Plan designed to reduce Ventura County greenhouse gas emissions to meet State goals. Included as part of the Climate Action Plan were new policies to reduce greenhouse gas emissions from oil and gas operations.

The regulation on eliminating routine flaring of natural gas produced in new drilling operations was designed to address the wasteful burning of a valuable energy resource and eliminate the significant air pollution and greenhouse gas emissions generated. The adopted regulation allows flaring for emergencies and testing.

Today, you are voting on changing the adopted flaring regulation. I strongly encourage you to vote no, allowing the existing regulation to remain in effect.

Today in Dubai the United Nations Climate Conference is refining international policies and programs to address Climate Change worldwide. Coincidentally, a major push by participants (including some major oil and gas companies) is to reduce greenhouse gas emissions from oil and gas operations including a ban on routine flaring of natural gas produced from new well drilling.

Looking at what is happening in Dubai today, it is clear that the Ventura County Planning Commission and Board of Supervisors were very prescient in the climate actions on flaring taken in 2020.

The problems with flaring haven't gone away. Flaring produces significant air pollution and greenhouse gas emissions and destroys a valuable energy resource without providing any benefit whatsoever. It is unconscionable to support the idea of routine flaring.

I urge you to vote no on changing this regulation.

Thank you,

Phil White

Ojai

Sent from my iPhone

Juachon, Luz

From: Caryn Bosson <caryndb@gmail.com>
Sent: Wednesday, December 6, 2023 5:13 PM
To: Sussman, Shelley
Subject: Agenda Item 6.A

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Dear County Leaders,

I urge you to refrain from adding the term "if feasible" to the General Plan related to protecting communities against air pollution. Human health is more important than profits.

We are in a climate emergency. As leaders, your community is relying on you to step up and stand for what health and safety demands. Please show courage and decide in favor of a livable environment.

Thank you for your attention.

Sincerely,

Caryn Bosson
3763 Grand Ave, Ojai, CA 93023

Juachon, Luz

From: Oil and Gas Ordinance
Subject: FW: Comment letter - FW: #6a

From: John Brooks <johnbrooks69@gmail.com>
Sent: Wednesday, December 6, 2023 10:43 PM
To: Sussman, Shelley <Shelley.Sussman@ventura.org>
Subject: #6a

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Dear Commissioners,

Our grandchildren will remember when we took action to fight climate change and when oil & gas money perverted the will of the people.

Please be certain of what you are doing.

The following is a critique of the staff report composed by scientists.

-
- “The original EIR determined that the benefits to human health and the environment from adopting the trucking/flaring policies without weakening them via a feasibility exception outweighed any effects on mineral and petroleum resources, especially benefits related to air quality, greenhouse gas emissions reductions, vehicle miles traveled, traffic safety.
-
- We are disappointed that the Staff Report / CEQA Addendum now conclude that “the potential economic, environmental and other implications of the proposed General Plan amendments would be speculative and marginal at most” because the trucking/flaring policies only apply to new discretionary wells.
-
- The fact that new discretionary wells are a subset of all wells drilled in the County does not change the original EIR’s conclusion that when such wells are drilled, their impacts to human health and the environment will be substantial.
-
- Even one new well where the operator successfully claims a feasibility exemption will have negative impacts on the surrounding community.

IS IT TOO MUCH TO ASK THAT YOU TAKE ACTION TO PROTECT US?

John Brooks
Oak View