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Wild



September 11, 2023

Ventura County Board of Supervisors
800 S Victoria Avenue
Ventura, CA 93009

SENT VIA EMAIL clerkoftheboard@ventura.org

Re: Agenda Item 66

Dear Supervisors,

We the undersigned, representing 13 organizations serving Ventura County, object to the settlement agreement between the County of Ventura and Oil Petitioners. The resolution being considered in Agenda Item 66 will render the safety buffer setback policy (COS-7.2) meaningless in stopping oil and gas drilling and expansion in neighborhoods of Ventura County. The consideration of amendments to weaken policies that reduce health-harming pollution from oil and gas operations (COS-7.7 and COS-7.8) will further threaten community health.

Oil and gas wells will still be drilled near homes and schools in Ventura County. As a result of multiple oil industry tactics to undermine our democracy, the safety buffer setback policy (COS-7.2) will apply to essentially no oil drilling or operations in Ventura County.

First, by further narrowing what is considered a “new” well to exclude reopening plugged wells and redrilling wells deeper and in new directions, this policy will fail to protect communities from expanded drilling and increased pollution in their backyards. Across California, hundreds of permits have been approved to deepen or redrill existing, low-producing wells this year.¹ Rather than investing in drilling brand new wells, the oil industry is cutting costs to tinker with unproductive wells rather than plugging

¹<https://www.prnewswire.com/news-releases/california-oil-regulators-continue-issuing-permits-in-q2-to-rework-leaky-unproductive-wells-should-order-plugging-instead-advocates-say-301877023.html>

and remediating them. Nearly one-third of all rework permits granted in the first six months of 2023 were for wells within six-tenths of a mile (3,200 feet) of communities.² Earlier this year, 23 wells were approved to be redrilled, 5 of which were reopened, near the Lemonwood neighborhood, school, and park in Oxnard. These wells disproportionately harm the vulnerable low-income and communities of color that live, work, learn, and play nearby. The setback policy (COS-7.2) was not applied to this expansion.

Second, the vast majority of drilling in Ventura County is currently considered ministerial and happens on antiquated permits that were issued up to 75 years ago – before environmental and health impacts were known, and long before bedrock environmental laws existed. Over 75% of active and idle wells in Ventura County are located on these antiquated permits.³ In 2020, this board tightened these outdated oil permitting practices to better protect public health, water supplies, and the environment. The oil industry spent 7 million dollars to challenge this common-sense improvement with a ballot referendum, misled and scared voters, and narrowly held on to this loophole. This deceitful tactic introduced a new loophole – the majority of wells in Ventura County skate by COS-7.2 because they are not considered discretionary.

Polluting industries should not be allowed to rewrite policies meant to regulate them. The consideration of amending policies to include “if feasible” will significantly weaken the protections COS-7.7 and COS-7.8 offer to frontline communities impacted by oil operation pollution. It is essential that in the reopening process to consider these amendments, community outreach and participation are robust, accessible, and meaningful, as dictated by state laws directing General Plans.

California Attorney General Bonta filed a brief in defense of these policies, stating:

Ventura County is facing nearly a dozen lawsuits for its adoption of commonsense policies that protect the health and safety of its communities. These lawsuits are misguided. Ventura County should be applauded for its 2040 General Plan, not taken to court. For decades, environmental inequities have been perpetuated by local land use policies. We're glad to see Ventura County try to break the cycle by moving new oil and gas wells away from schools and homes and restricting unnecessary emissions of toxic pollutants. As my office makes clear in our brief, these oil and gas policies do not conflict with state law and are an important example of responsible governance.⁴

Now more than ever, we need you, our leadership, to focus attention on the impacts of climate change and recognize that there is no safe way to drill for oil in our communities. We urge you to defend community health, climate, and the policies we created together through a public, forward-looking, and thorough process.

With urgency,

Haley Ehlers, Executive Director
Climate First: Replacing Oil & Gas (CFROG)

Tomás Morales Rebecchi, Organizing Manager
Food & Water Watch

²<https://www.prnewswire.com/news-releases/california-oil-regulators-continue-issuing-permits-in-q2-to-rework-leaky-unproductive-wells-should-order-plugging-instead-advocates-say-301877023.html>

³<https://cal.streetsblog.org/2022/02/22/ventura-ballot-measure-would-crack-down-on-antiquated-oil-drilling-permits>

⁴<https://oag.ca.gov/news/press-releases/attorney-general-bonta-files-brief-defense-ventura-county-policies-protect>

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Keep Sespe Wild

Faith Grant & Adrian Conway, Co-Chapter Leads
Ventura County Chapter - Citizens' Climate Lobby

CC: Supervisor Matt LaVere, Supervisor Jeff Gorell, Supervisor Kelly Long, Supervisor Janice S. Parvin,
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