

Gaines, Lori

From: Jan Dietrick <jdietrick9@gmail.com>
Sent: Tuesday, September 10, 2019 2:12 AM
To: Bennett, Steve; Parks, Linda; Zaragoza, John; Long, Kelly; Supervisor Huber
Cc: ClerkoftheBoard, ClerkoftheBoard; Curtis, Susan
Subject: Comments on 9/10 Agenda including HAZ 10-11 proposed by Planning Commission and Item #35

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Dear County Supervisors,

RE: HAZ-10-11

The Planning Commission discussed this issue adequately in its second workshop and Commissioner White worked on it with Counsel so that it was clear at the third workshop. They paid attention in all of their deliberations and they knew what they were unanimously voting for at the third workshop to count "total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act." This policy is important to assure compliance with CEQA in drilling permit applications. This policy called HAZ-10.11 must be approved:

"The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District, except that emissions from APCD permitted sources shall also be included in the analysis. The County General Plan Update Board of Supervisors Hearing shall revise the Initial Study Assessment Guides to implement this policy.

RE: agenda item 35

Oil producers can no longer be allowed to renew antiquated Conditional Use Permits without environmental review. We support discretionary permitting, and not ministerial "rubber stamp" approval, for these old permits.

If we seriously want to address climate change, we have to have more public notice of these policy decisions going on your agenda, more clear, accessible information, and easier ways for the public to offer input to serious discussions about how to transition away from fossil fuels.

As new reports describe worse and worse impacts of the climate crisis the goal of every jurisdiction must be modeled after that of the City of Los Angeles Green New Deal to set the milestone of reducing oil production by 40% below 2013 levels by 2021 and work towards a sunset strategy for oil and gas production which includes a directive to “evaluate the feasibility of a **no drill health and safety buffer zone** between oil and gas production facilities and communities” (p. 91). As we have stated repeatedly, on principle, all emissions resulting from activities in the county and downstream emissions of products from the county must be accounted for. At the very least, we expect no change in the following policies:

The county shall require that gases emitted from all new discretionary oil and gas wells shall be collected and used or removed for sale or proper disposal. Flaring or venting shall only be allowed in cases of emergency or for testing purposes. (This should apply to existing wells and be used as a basis for producers to shut down wells where the cost of capturing gas is economically infeasible.)

- New discretionary oil wells shall be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school.
- The county shall require discretionary proposed projects that include fracking, well stimulation treatment, cyclic steaming, and steam flooding be evaluated for potential effects on ground water contamination, exacerbation of seismic activity, water use, greenhouse gas (GHG) emissions, and other impacts.

Sincerely,

Jan Dietrick, Policy Team Lead, 350 VC Climate Hub
108 Orchard Dr, Ventura, CA 93001