

July 23, 2019

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

**SUBJECT: De Novo Hearing to Consider the Granting of a Modified Conditional Use Permit and Approval of a Mitigated Negative Declaration Addendum Pursuant to the California Environmental Quality Act, to Authorize the Addition of Four New Oil and Gas Wells to an Existing Oil and Gas Facility at 3214 Etting Road, Near State Route 1 and Pleasant Valley Road, the Relocation and Replacement of Ancillary Equipment, and the Extension of the Permit Term by 12 Years, to 2049 (Case No. PL14-0103); Consideration of a Related Appeal of the Planning Commission's Decision Regarding the Same Matter; Supervisorial District No. 3.**

**A. RECOMMENDED ACTIONS:**

1. **CERTIFY** that your Board has reviewed and considered this Board Agenda Letter and all exhibits hereto, including the 1986 Mitigated Negative Declaration (MND) (Exhibit 4b), and Addendum thereto (Exhibit 22), and has considered all comments and testimony received during the public comment and hearing process;
2. **FIND** that that there is no substantial evidence supporting a fair argument that the proposed project may produce a previously unstudied significant environmental impact and **APPROVE** the MND Addendum (Exhibit 22) as satisfying the environmental review requirements of the California Environmental Quality Act (CEQA);
3. **MAKE** the required findings to grant a minor modification of a CUP pursuant to section 8111-1.2.1.1 of the Ventura County Non-Coastal Zoning Ordinance as listed in section B of Exhibit 1a;
4. **GRANT** minor modification of CUP 4384, subject to the conditions of approval (Exhibit 23);
5. **DENY** the appeal jointly submitted by Climate First: Replacing Oil and Gas (CFROG; formerly known as *Citizens for Responsible Oil and Gas*), and Food and Water Watch (FWW) in its entirety, and decline to refund any appeal fees; and



6. **SPECIFY** that the Clerk of the Board of Supervisors is the custodian, and 800 S. Victoria Avenue, Ventura, CA 93009 is the location, of the documents and materials that constitute the administrative record of proceedings upon which the foregoing decisions are based.

**B. FISCAL/MANDATES IMPACT AND APPEAL FEES:**

In accordance with the Board-adopted Planning Division Fee Schedule, the Appellants, CFROG and FWW, jointly submitted a \$1,000 fee to appeal the decision by the Planning Commission to approve the proposed project. The Applicant, Renaissance Petroleum, LLC, is responsible for an additional \$1,000 of the Planning Division's costs to process the subject appeal.

County costs in excess of the appeal fees received from the Appellants and Applicant will be funded out of the Planning Division fiscal year 2018-19 budget. To date, the County cost to process the appeal of the Planning Commission decision to approve the proposed project is \$38,614.05. This is in addition to the cost already incurred by the County to process the Appellants' previous appeal of the Planning Director decision to approve the proposed project, which was \$37,047.78. The County's cost to process the appeals of both the Planning Director and Planning Commission decisions is \$75,661.83. The Appellants are responsible for \$1,000 of the County cost for each appeal. And the Applicant is responsible for \$1,000 of the cost for each appeal. Thus, the net cost to the County to process the appeals is currently \$71,661.83.

If the current appeal is granted by your Board in whole, \$1,000 in appeal fees must be refunded to the Appellants for their joint appeal of the Planning Commission's decision to approve the proposed project. If the appeal is granted in part, your Board may decide to refund a portion of the \$1,000 appeal fees if one or more of the grounds for appeal that were raised by the Appellants to the Resource Management Agency before filing the appeal were sustained and caused a material change in the matter being appealed.

**C. PROPOSED PROJECT**

The Applicant requests that a modified conditional use permit (CUP) be granted to authorize the continued use and expansion of an existing oil and gas facility, known as the Naumann facility, located at 3214 Etting Road near State Route 1 and Pleasant Valley Road, through year 2049.

The existing facility is comprised of one oil and gas well, gathering pipelines, and storage and processing equipment and operations. The proposed project includes the addition of four new oil and gas wells on the approximately 1-acre drill site, and the relocation of various pieces of equipment in order to facilitate the placement of the new wells. The project also includes the replacement of three oil and produced water storage

tanks with larger tanks. The project includes the following components, as illustrated in Exhibit 3:

- a) Installation, testing, operation, reworking, and maintenance of a total of five oil and gas wells (i.e., one existing well and four proposed wells).

The existing oil and gas well is designated as Naumann No. 1 (API No. 11121431) with the coordinates (NAD83): 34.1603, -119.131007. The four proposed oil and gas wells and pumping units will be designated as Naumann Nos. 2 through 5 and will be located on the existing drilling pad. All of the drilling, completion, and production operations will be conducted in accordance with the rules and regulations of the California Department of Conservation, Division of Oil and Gas and Geothermal Resources (DOGGR).

- b) The operation of equipment such as pumps, heaters, and refrigeration systems, and compressors for the separation of natural gas and produced water from crude oil, the separation of natural gas liquids from produced natural gas, and the processing of the natural gas to the specifications established by the Southern California Gas Company (SCGC) for the introduction of the natural gas into the SCGC distribution pipeline system for sale to local customers.
- c) The operation of equipment such as pumps and compressors to support the on-site injection of produced water into a well or wells for disposal purposes, the on-site injection of natural gas into a well or wells for the purpose of reservoir pressure maintenance, and to support the utilization of natural gas for gas lifting of liquids from wells. Any injection activities will only involve water or gas produced at the subject Naumann drill site or the Rosenmund drill site (authorized under CUP 5252) that is also operated by the Applicant. Fluids and gas produced at the separately permitted Rosenmund oil and gas facility are currently conveyed by existing pipelines to the Naumann facility.
- d) The transport of gas, natural gas liquids, crude oil, and produced water from the site. Produced water may either be conveyed by pipeline to the Rosenmund drill site for injection into an existing well or transported by truck to a permitted commercial facility for disposal.
- e) The installation and operation of equipment and structures associated with the storage, processing, and transporting of oil, gas, natural gas liquids, and water, as shown on site plans (Exhibit 3).
- f) Implementation of a fluid truck transport limit. No more than 10 truckloads (20 one-way trips) of produced fluids may depart from the Naumann facility per day. Additionally, no more than 3 of the 10 truckloads (6 one-way trips) may depart within any one hour. Truck transport of fluids will be further limited to no more

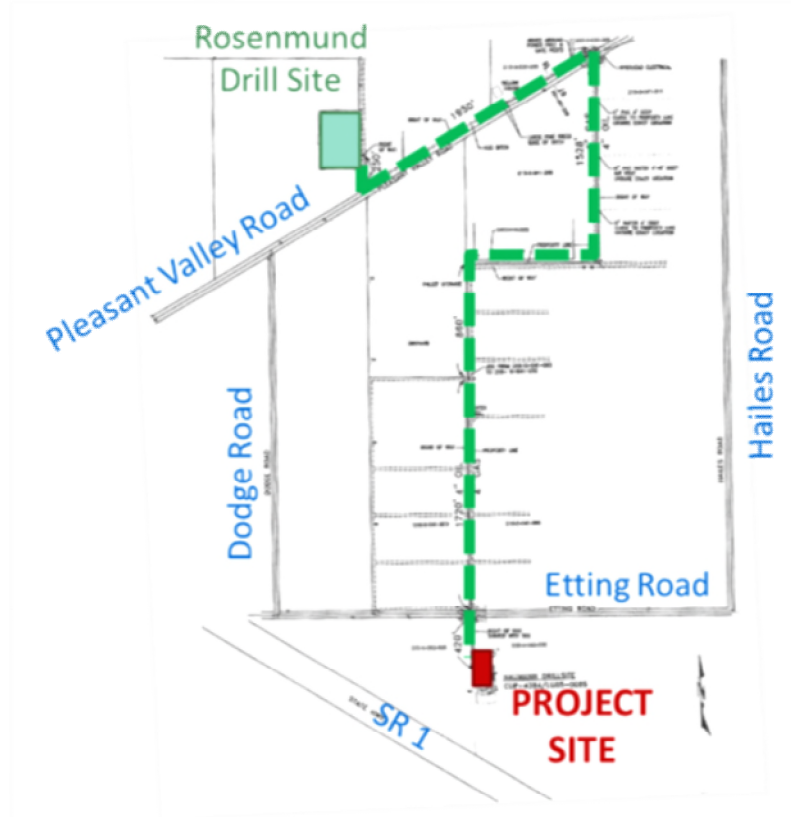
than 2 truckloads (4 one-way trips) departing from the facility during peak traffic hours (6-8 a.m. and 4-6 p.m., Monday-Friday).

- g) Extension of the hours of fluid transport (trucking) to 24 hours per day, 7 days per week from the currently authorized 7:30 a.m. to 6:30 p.m., Monday through Saturday schedule.
- h) Modifications of the ancillary equipment used at the facility as follows:
  - 1. Removal of two existing 500-barrel crude oil storage tanks;
  - 2. Removal of one existing 500-barrel produced water storage tank;
  - 3. Installation of two new 1,000-barrel crude oil storage tanks;
  - 4. Installation of one new 1,000-barrel produced water storage tank;
  - 5. Relocation of one existing 500-barrel fire water storage tank;
  - 6. Relocation of one existing 20-foot tall light post; and,
  - 7. Relocation of one existing emergency gas flare.

Each of the three proposed new tanks is 21 feet in diameter and 16 feet in height.

The oil and gas facility at the Naumann drill site is connected by two existing pipelines to the separately permitted Rosenmund drill site (Figure 1 below and Exhibit 8). The Rosenmund facility is located approximately 0.75 miles (3,960 feet) north of the Naumann drill site at 2797 East Pleasant Valley Road. The facilities and activities at the Rosenmund drill site are separately authorized by CUP 5252 to operate until the year 2032 and are not subject to the Applicant's pending application. Oil, gas and water produced at the Rosenmund drill site are currently conveyed by the existing pipelines to the processing and storage facilities at the Naumann drill site. The existing oil well and the other facilities at the Naumann drill site are authorized by CUP 4384 to operate until the year 2037. *(Note: The Rosenmund and Naumann facilities can operate separately without the current consolidation of processing facilities in accordance with the terms of each existing permit.)*

Figure 1 – Existing Pipeline Route: Naumann-Rosenmund



No additional grading or expansion of the existing Naumann drill site is proposed. The Applicant also requests that the current permit expiration date of 2037 be extended to the year 2049 (i.e., 12 additional years).

The proposed project involves the production of oil and gas from reservoirs located more than 3,000 feet below the ground surface. Steam injection methods used to recover heavy oil will not be utilized as part of the project.

The proposed project is located outside of the new oil well moratorium area established by Ventura County Interim Urgency Ordinance No. 4542 and is not subject to the ordinance.

Hydraulic fracturing, acid well stimulation and other “well stimulation treatments,” as defined in Public Resources Code section 3157, are not included in the proposed project. The use of any such well stimulation treatment as part of the project would require a subsequent discretionary modification of the CUP, additional environmental review under CEQA, and a public hearing.

## **D. DISCUSSION OF DE NOVO HEARING TO CONSIDER CASE NO. PL14-0103**

### **Standard of Review and Authority of the Board**

This land use matter comes before your Board as an appeal of the Planning Commission's September 7, 2017 decision to grant the Applicant, Renaissance Petroleum, LLC, a modified CUP with a 30-year term, and to approve the MND Addendum prepared for the proposed project pursuant to CEQA. Since the 2017 Planning Commission hearing, additional analysis of the potential effects on air quality, greenhouse gas emissions, and health risk have been completed by the Ventura County Air Pollution Control District (VCAPCD).

Under the Ventura County Non-Coastal Zoning Ordinance (NCZO), the Applicant's request for a modified CUP, and the related consideration of the MND Addendum, comes to your Board for a hearing *de novo*, or anew. This means your Board is required to conduct a public hearing on the requested land use entitlement and CEQA document just as if the matter came to your Board in the first instance pursuant to sections 8111-4 et seq. of the NCZO. In this regard, your Board has the authority to approve, deny, or approve with modifications the requested land use entitlement.

Your Board is not required to give any deference to the Planning Commission's findings or decision regarding the proposed project, or to the above-stated recommendations. Of course, your Board is free to make the same findings and decisions as the Planning Commission if, based on your independent judgment, your Board finds them to be persuasive and supported by substantial evidence in the record. While your Board should consider the points raised by the Appellants in the appeal, your Board is not limited by them. Whether or not the appeal should be granted is a consequence of your Board's final decision on the merits of the land use entitlement request, and not on the merits of the appeal points.

## **E. LAW GOVERNING DECISION**

### **Ventura County Non-Coastal Zoning Ordinance**

Pursuant to sections 8105-4 and 8111-1.2.1.1a of the NCZO, the proposed continued operation and expansion of the existing oil and gas facility is allowed in the AE 40-acre zone where the subject property is located with the granting of a CUP. In order to grant the requested CUP, your Board must make the required findings specified in section 8111-1.2.1.1a of the NCZO based on the whole of the record. These findings are:

1. The proposed development is consistent with the intent and provisions of the County's General Plan and of Division 8, Chapters 1 and 2, of the Ventura County Ordinance Code;

2. The proposed development is compatible with the character of surrounding, legally established development;
3. The proposed development would not be obnoxious or harmful, or impair the utility of neighboring property or uses;
4. The proposed development would not be detrimental to the public interest, health, safety, convenience, or welfare;
5. The proposed development, if allowed by a conditional use permit, is compatible with existing and potential land uses in the general area where the development is to be located;
6. The proposed development will occur on a legal lot; and
7. The proposed development is approved in accordance with CEQA and all other applicable laws.

The recommended actions stated on page one of this Board Agenda Letter include these findings of approval. The supporting evidence to make these findings is found in section E of the Planning Director and Planning Commission staff reports (Exhibits 1a and 1b).

Section 8111-1.2.1.1a of the NCZO states that if all applicable standards cannot be satisfied, your Board must make specific factual findings to support that conclusion. Therefore, should your Board decide to deny the modified CUP application, your Board should articulate on the record specific factual findings that support the decision.

### **California Environmental Quality Act**

An action by your Board to grant the requested modified CUP requires approval of an associated CEQA document. Staff recommends that your Board approve the MND Addendum (Exhibit 22) as satisfying the environmental review requirements of CEQA.

On December 19, 1986, the Planning Director adopted an MND as part of the granting of CUP 4384 to authorize the installation, operation and maintenance of one exploratory oil and gas well and associated facilities at the subject Naumann drill site.

The MND identified one potentially significant impact from the development of the proposed oil and gas facility on the project site: an impact on agricultural resources due to the loss of approximately two acres (87,120 square feet) of an existing orchard to create the drill site. At the time, the land owner was operating the property under a Land Conservation Act (Gov. Code §§ 51200 et seq.) contract, which restricts contracted land

to agricultural or open space uses for 10 years in exchange for preferential property tax treatment. In addressing this potential impact, the MND recommended limiting the area of the graded site to 28,000 square feet (0.64 acres), replanting of trees of the same variety when well abandonment occurred, and minimizing dust along access roads. The MND is attached as Exhibit 4b.

Under CEQA Guidelines sections 15162 and 15164, an addendum to an environmental impact report (EIR), negative declaration (ND) or MND originally adopted for a project is the appropriate means of documenting the fact that none of the conditions set forth in section 15162 calling for the preparation of a subsequent EIR, ND or MND have occurred with respect to a project modification for which a subsequent discretionary approval is sought. Section 15162 requires the lead agency to prepare a subsequent EIR, ND or MND if new significant environmental effects would result from the proposed project, if the severity of previously identified significant environmental impacts would increase due to the project, or if a change in circumstances under which the project is undertaken warrants major revisions to the previously adopted MND.

Recent court decisions have clarified how this standard is applied to a project that is proposed for modification, such as the one before your Board, for which an ND or MND – as opposed to an EIR – was adopted for the original project. For such projects, “major revisions” to the previous ND or MND are required, triggering the need for a subsequent ND or MND, if there is substantial evidence to support a fair argument that the proposed project changes may have a significant environmental impact not previously studied in the previous CEQA document. In other words, when there is a fair argument, supported by substantial evidence, that the project changes may cause a previously unstudied significant environmental impact, a subsequent ND or MND is required. Otherwise, an addendum to the previously approved ND or MND is the appropriate CEQA document.

In contrast, if the proposed project modification introduces previously unstudied and potentially significant environmental effects that cannot be avoided or mitigated through further revisions to the project plans, then the appropriate environmental document would no longer be an ND or MND at all, but rather would be an EIR.

Planning Division staff have not identified any substantial evidence that the proposed project changes may cause a significant environmental impact that was not studied in the original MND prepared for the project (Exhibit 4b). Thus, staff recommends that your Board find that no subsequent ND, MND or EIR is required for the proposed modified project, and that the MND Addendum dated July 23, 2019 (Exhibit 22) is the appropriate document to satisfy the environmental review requirements of CEQA.

## **F. PROJECT HISTORY**

The Naumann oil and gas facility that is the subject of the requested modified CUP is located just east of the intersection of State Route 1 and Pleasant Valley Road on a 26-



acre parcel of land that is also used for the production of various row crops (e.g., cabbage and celery). The project site is located just over 1600 feet southeast of the City of Oxnard, in an area of predominately agricultural uses. A summary of the key permitting actions to date is provided below.

On December 19, 1986, the Planning Director granted CUP 4384 to Cities Service Oil and Gas Company to authorize the installation, operation and maintenance of one exploratory oil and gas well and associated facilities on what was a lemon orchard. The permitted processing operations included the separation of produced water and natural gas from crude oil and those processing operations required for injection purposes and for the transportation of production products from the site. The CUP was granted for a 20-year period ending on December 23, 2006. As part of this action, an MND was adopted.

On May 21, 2007, the Planning Director granted a modified CUP (Case No. LU05-0086) to Renaissance Petroleum, LLC, to authorize a 30-year extension of the effective period of CUP 4384, and to authorize the drilling of one additional well and construction of two gathering pipelines connecting the nearby Rosenmund drill site to the Naumann drill site. This allowed for the consolidation of various processing and production activities in accordance with the provisions of the NCZO. The approved site plan also included an expansion of the existing drilling pad to its current size of approximately 41,300-square feet (0.94 acres [140-feet by 295-feet]). The drilling of the additional well was required to be completed within three years of the CUP's approval; however, no well was drilled and this component of the entitlement has expired. The current expiration date of the CUP is May 21, 2037.

On July 24, 2014, the Applicant applied for the modified CUP (Case No. PL14-0103) that is currently before your Board.

## **G. PREVIOUS HEARINGS AND APPROVALS BY COUNTY DECISION MAKERS**

### **Planning Director Hearing of February 23, 2017 and Decision of April 3, 2017**

In accordance with sections 8105-4 and 8111-1.2 et seq. of the NCZO, the Planning Director was the County's initial decision-making authority for the requested modified CUP. On February 23, 2017, a Planning Director hearing was conducted regarding the proposed project. The Planning Director approved the project on April 3, 2017. Exhibit 9 to this Board letter includes public comments presented at this Planning Director hearing along with County responses to those comments. On April 13, 2017, the Planning Director's decision was jointly appealed by CFROG and FWW to the Planning Commission.

In their appeal, the Appellants argued that the proposed project required preparation of an EIR and that the Planning Director's decision:

1. Violated CEQA;
2. Violated state environmental justice statutes;
3. Violated the NCZO;
4. Violated other regulations, policies, and procedures; and
5. Failed to provide due process of law.

### **Planning Commission Hearing and Decision of September 7, 2017**

On September 7, 2017, a *de novo* public hearing was held by the Planning Commission to consider the proposed project. The Planning Commission heard approximately seven hours of public testimony by County staff, the Appellants, the Applicant and members of the public. Additionally, various documents were submitted as part of the public testimony presented at the hearing (see Exhibits A through F). Planning Division staff recommended that the Planning Commission grant the modified CUP, approve the MND Addendum, and deny the appeal (see Exhibit 1a).

After the public hearing was closed, Planning Division staff reviewed the public testimony received during the hearing and provided oral responses to the key points raised by both the Appellants and members of the public.

Planning Division staff stated they did not identify any substantial evidence of a potentially significant environmental impact or an inconsistency of the proposed project with applicable laws and regulations. Planning Division staff recommended that the Planning Commission approve the MND Addendum and grant the requested CUP with no changes to the proposed CUP conditions of approval.

Following the close of the public hearing and completion of deliberations, the Planning Commission voted 3-1 (with one commissioner abstaining) to approve the MND Addendum, grant the requested modified CUP, and deny the appeal, with no alterations of the staff recommendation.

### **H. APPEAL OF PLANNING COMMISSION DECISION**

On September 15, 2017 the Appellants, CFROG and FWW, filed a timely appeal (Exhibit 20) of the Planning Commission's decision to approve the MND Addendum and grant the requested modified CUP.

#### **Ground of Appeal and Staff Analysis:**

The ground of appeal set forth in the Appellants' current appeal form (Exhibit 20) is slightly different from the grounds of appeal set forth in the Appellants' previous April 13,

2017 appeal form (Exhibit 10) filed to appeal the Planning Director decision. The ground of appeal before your Board is listed below along with staff analysis and response.

**Appellants' Appeal Issue:**

*The Planning Commission used an incorrect standard of review in finding that the project does not require an environmental impact report.*

*The correct "fair argument" CEQA standard of review requires the County to prepare an Environmental Impact Report for the project (Friends of College of San Mateo v. San Mateo Community College District (2016) 1 Cal.5th 937; Friends of College of San Mateo v. San Mateo Community College District (May 5, 2017) 11 Cal.App.5th 596).*

*The Environmental Impact Report should include a cumulative impact study of this project, existing development, and the foreseeable future development and expansion of the Cabrillo Oil Field.*

**Staff response:**

The Planning Commission did not apply an incorrect CEQA standard in approving the proposed MND Addendum (Exhibit 4a). At the Planning Commission hearing, County Counsel articulated the correct standard which is set forth in the legal opinions cited by the Appellants. The Planning Commission was informed that if there is a fair argument, supported by substantial evidence, that the proposed project may have a significant environmental impact that was not previously studied in the MND for the original project, a subsequent MND or EIR is required. Otherwise, an addendum to the previously approved MND is the appropriate CEQA document.

Again, Planning Division staff have not identified any substantial evidence that supports a fair argument that the proposed project may have a previously unstudied, significant environmental impact. Thus, staff recommended that the Planning Commission, and now recommends that your Board, find that no subsequent MND or EIR is required for the proposed project, and that the revised MND Addendum (Exhibit 22) is the appropriate document to satisfy the environmental review requirements of CEQA.

One critical component of CEQA's applicable "fair argument" standard, as indicated above, is the requirement that substantial evidence support the fair argument that the proposed project changes may have a previously unstudied, significant environmental impact. The following sections of the CEQA Guidelines describe the need for, and define, "substantial evidence" as used in this context:

**Section 15064(f)(4):**

*“The existence of a public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence before the agency that the project may have a significant effect on the environment.”*

**Section 15064(f)(5):**

*“Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”*

The potential impacts of the proposed project are evaluated in the MND and MND Addendum dated July 23, 2019 (Exhibit 22) in accordance with the requirements of CEQA and the CEQA Guidelines. The conformance of the design of the proposed project with applicable regulations set forth in the NCZO, and its consistency with County General Plan policies, are evaluated in the Planning Commission staff report (Exhibit 1a).

Although the Appellants contend that the project requires the preparation of an EIR, no substantial evidence has been presented establishing that a previously unstudied significant environmental impact may result from implementation of the proposed project, and that the impact could not be mitigated to a level of less than significant.

In previous public testimony, the Appellants have asserted that a “full” EIR is required due to the potential cumulative impacts associated with the Naumann drill site becoming the “hub” of the entire Cabrillo Oil Field. The project under review (PL14-0103) is comprised of minor changes to the existing oil and gas operation at the Naumann drill site. These changes involve the installation of four additional wells and the relocation and upgrading of ancillary equipment, but do not involve any expansion of the existing drill site footprint. Additionally, no changes to the existing, separately permitted oil and gas facility at the Rosenmund drill site (currently operated by Renaissance Petroleum under CUP 5252) are proposed. Even if the Rosenmund drill site were authorized by the same CUP as the Naumann facility, the scope of the project currently under review would still be limited to the proposed changes to the Naumann facility. Thus, the “whole of the action” has been the subject of environmental review as required by CEQA.

The Appellants and members of the public have also expressed concerns that emissions from the proposed project may have a significant adverse health impact on the surrounding community. These have included concerns regarding the potential cumulative health risks presented by the air emissions from the proposed project in combination with pesticide use on nearby row crops.

In response to these concerns, the Ventura County Air Pollution Control District (VCAPCD) prepared a memorandum dated August 17, 2017 (Exhibit 14) that assesses the health risk posed by the proposed project. Subsequent to the September 7, 2017 Planning Commission hearing, the VCAPCD updated this health risk analysis with the preparation of two additional memoranda dated October 3, 2018, and October 4, 2018.

These additional memoranda provide a Health Risk Assessment and a Health Risk Representation (HRR) using facility prioritization procedures to address potential air toxic emissions associated with the proposed project. The memoranda are provided as Attachments 11 and 12 of the MND Addendum dated July 23, 2019 (Exhibit 22). As discussed in the MND Addendum, the APCD concluded that the project will not result in a potentially significant human health risk.

For the foregoing reasons, Planning Division staff has concluded that this ground of appeal lacks merit.

#### **I. APPELLANTS' RECOMMENDED ACTIONS:**

The Appellants request that your Board take the following actions:

1. *Uphold the appeal and deny the project*
2. *Require the Planning Division to prepare an Environmental Impact Report.*

#### **J. NOTICE AND PUBLIC COMMENTS**

The Planning Division provided public notice of this hearing in conformance with the requirements of Government Code section 65091 and NCZO section 8111-3.1. The Planning Division mailed notice to owners of property within 1,000 feet of the property on which the project site is located, posted a notice on the Planning Division website, and placed a legal ad in the *Ventura County Star*. In total, owners of 23 parcels were notified. Additional noticing was provided to the cities of Oxnard, Camarillo and Port Hueneme, DOGGR, Caltrans, the Ocean View School District, and the Oxnard City Council, as well as to the two nearby mobile home parks, Silver Wheel Mobile Home Park and the Oxnard Pacific Estates Mobile Home Park. The Appellants were notified of the date of the appeal hearing on May 21, 2019 (Exhibit 21).

More than 1000 public comments have been received regarding the project since the Planning Director's action of April 3, 2017 (Exhibits 16, 18 and 24). These include more than 900 letters expressing support of the proposed project and approximately 150 letters of opposition. In addition, the Appellants submitted a list of signatures from a petition they circulated in opposition to the project prior to the September 7, 2017 Planning Commission hearing (Exhibit 18).

This Board item was reviewed by County Counsel and the County Executive Office. If you have any questions regarding this matter, please contact me at (805) 654-2481, Brian R. Baca at (805) 654-5192, or Bonnie Luke at 654-5193.



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Dave Ward, Director  
Ventura County Planning Division

#### **Attachments:**

- Exhibit 1a Planning Commission Staff Report for the September 7, 2017 hearing
- Exhibit 1b Planning Director Staff Report for the February 23, 2017 hearing

*Note: Exhibits 2 through Exhibit F (below) are attachments to the Planning Commission staff report.*

- Exhibit 2 Location Map
- Exhibit 3 Site Plans
- Exhibit 4a Revised MND Addendum (As approved by the Planning Commission on 9-7-17)
- Exhibit 4b Mitigated Negative Declaration
- Exhibit 5 Draft Conditions of Approval
- Exhibit 6 Letters Submitted in Favor of Project at time of Noticing for Previously Scheduled Planning Director Hearing
- Exhibit 7 Pipeline Feasibility Analysis
- Exhibit 8 Existing Gathering Pipelines
- Exhibit 9 4-3-17 Planning Director Decision Documents
- Exhibit 10 Appeal Form filed by CFROG and FWW, dated April 13, 2017
- Exhibit 11a Truck Traffic Analysis based on DOGGR Production Records for 2010-2014
- Exhibit 11b 2013-2014 Truck Trip Data for Renaissance Petroleum
- Exhibit 12 Traffic Collision Summary Reports for 2006-2016
- Exhibit 13 Cities of Port Hueneme/Oxnard Truck Traffic Study, June 2008
- Exhibit 14 8-17-17 APCD Memorandum on Health Risk
- Exhibit 15 Revised Conditions of Approval
- Exhibit 16 Additional Public Comments
- Exhibit 17 Memo to Commissioners dated September 5, 2017 (additional condition of approval)
- Exhibit 18 Additional Public Comments (received after August 28, 2017)
- Exhibit 19 Planning Commission Hearing Staff Powerpoint Presentation

Exhibit A	Cabrillo Oil Field Expansion Report submitted by CFROG
Exhibit B	Documents and Correspondence submitted by CFROG
Exhibit C	Appellants' Powerpoint Presentation
Exhibit D	Renaissance Petroleum Correspondence dated September 7, 2017
Exhibit E	Letters Submitted by California Independent Petroleum Association (CIPA)
Exhibit F	CFROG Appeals of Oil and Gas Projects in Ventura County

*Note: Exhibits 20 through 24 below are new materials received or created after the September 7, 2017 Planning Commission hearing.*

Exhibit 20	Appeal Form filed by CFROG and FWW, dated September 15, 2017
Exhibit 21	Notification to Appellants of Board of Supervisors Appeal hearing
Exhibit 22	MND Addendum dated July 23, 2019
Exhibit 22b	MND Addendum Attachments Package 190626
Exhibit 23	Revised Conditions of Approval dated July 23, 2019
Exhibit 24	Additional Public Comments (received after September 7, 2017)
Exhibit G	Flare Test Report Submitted by Applicant, dated June 25, 2019
Exhibit H	Limits of the Vaca Tar Sand Report Submitted by Applicant, dated July 12, 2019
Exhibit I	Letter to Board and Supplemental Info Submitted by Applicant, dated July 15, 2019