

Board of Supervisors Hearing
July 23, 2019

**MINOR MODIFICATION TO RENAISSANCE PETROLEUM PROJECT
CONDITIONAL USE PERMIT NO. 4384
CASE NO. PL14-0103**

Exhibit 27

Memorandum to the Board_dated July 22, 2019
Response to Public Comment form Letter




Memorandum to the Board of Supervisors

County of Ventura • Resource Management Agency • Planning Division

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • ventura.org/rma/planning

To: The Honorable Board of Supervisors

From: Dave Ward, Planning Director 
Bonnie Luke, Senior Planner
Ventura County Planning Division

Date: July 22, 2019

Re: **Renaissance Petroleum Project, PL14-0103:**
Response to letter (email) submitted as part of public comment

INTRODUCTION

Included in the public comment submitted to your Board for the July 23, 2019 public hearing on the Renaissance Petroleum project are more than 150 copies of the attached form comment letter. This memorandum provides a staff response to the issues raised in the letter.

DISCUSSION

General Response:

The attached letter is written as though no analysis of the proposed project has been prepared by the County, and misrepresents the project as proposing the construction of a new oil and gas processing facility. The Planning Division, in consultation with other agencies, has thoroughly evaluated the proposed project as reflected in the Board letter and exhibits provided for your Board's consideration.

The comment letter expresses opposition to the project based upon several general themes but does not provide any new analysis or information relevant to the proposed project, and does not identify an inconsistency of the proposed project with any land use law or regulation. The letter does not dispute (or even mention) any of the substantial analysis that has been incorporated into the July 23, 2019 Mitigated Negative Declaration (MND) Addendum (Exhibits 22 and 22b of the Board Letter) or the other documents provided by staff for your Board's consideration. Thus, the comment letter does not provide or constitute substantial evidence that the proposed project may have a significant effect on the environment requiring preparation of an environmental impact report under the California Environmental Quality Act (CEQA).

The comment letter requests that your Board act by "sending the project back to the planning department." Returning the proposed project back to the Planning Division

would not change the facts of the case, the applicable planning policies, regulations and environmental thresholds, or the conclusions reached by Planning Division staff. Based on its lack of significant environmental impacts and consistency with applicable laws and regulations, staff recommends that the project be approved.

Responses to issues mentioned in the form letter:

The comment letter expresses opposition to the proposed project based on concerns regarding the following issue areas: public health, air quality, truck traffic, pesticide use and environmental justice. Each of these issues is addressed in documents submitted as part of the Board letter: the Planning Commission staff report (Exhibit 1a) and the July 23, 2019 MND Addendum (Exhibits 22 and 22b). Provided below are brief responses to issues raised in the letter.

Public Health:

Incorporated into the MND Addendum are two October 2018 memoranda prepared by the Ventura County Air Pollution Control District (VCAPCD). These memoranda report the results of a site-specific analysis of the potential health risk that would result from implementation of the proposed project. For both the proposed addition of 4 new oil wells to the Naumann drillsite and the cumulative effect of the 7 already permitted wells at the Rosenmund drillsite plus the 4 proposed Naumann wells, the VCAPCD has concluded that the potential public health risk is less than significant.

Air Quality:

The air pollutant emissions that would result from development of the proposed project have been calculated by the VCAPCD and are disclosed in the MND Addendum (Exhibits 22 and 22b). Those emissions are below the threshold of significance established in the adopted Air Quality Assessment Guidelines (AQAG) and constitute a less than significant impact. The cumulative emissions of the already permitted wells at the Rosenmund drillsite plus the proposed 4 new wells at the Naumann drillsite are also below the adopted threshold and less than significant.

Truck Traffic:

The letter states that a "significant number of trucks" will be required in association with the proposed project. As disclosed in the MND Addendum (Exhibits 22 and 22b), the increase in truck traffic that would be generated with implementation of the proposed project is 2.18 one-way trips per day. This project-related traffic volume is negligible in comparison to the existing traffic load on nearby area roadways. For example, the traffic volume on Rice Road is approximately 31,700 vehicles per day, about 2,000 of which are heavy truck trips. The current traffic volume on Pleasant Valley Road is about 15,900 vehicles per day, while the volume of traffic on Etting Road is 2,700 vehicles per day. Although specific trip data is not available for Dodge Road, this road is regularly

traveled by both cars and heavy trucks, and provides a signalized intersection for connecting with Pleasant Valley Road. The increase of 2.18 one-way trips per day in traffic associated with development of the proposed project would not result in a significant impact on traffic circulation or safety. Additionally, the proposed changes to the allowed trucking days and hours for the facility would allow more of the truck traffic associated with the project to occur during off-peak traffic periods when school busses and commuters would be less prevalent.

About two-thirds of the estimated project traffic volume is associated with wastewater disposal. Since August 2017, however, the facility operator has disposed of all produced wastewater into a DOGGR-permitted injection well located on the nearby Rosenmund drillsite rather than truck the water to an offsite disposal facility. If this injection well proves viable for long-term water disposal, the truck traffic volume associated with the proposed project would drop to approximately 0.7 one-way trips per day.

In summary, the proposed project will not result in a significant effect on traffic circulation.

Pesticide Use:

The proposed project does not involve pesticide use. Use of agricultural chemicals on the agricultural fields that surround the project site and border the City of Oxnard is addressed on Page 32 of the MND Addendum (Exhibit 22). The application of such chemicals is regulated by the Agricultural Commissioner in accordance with state and federal law.

Environmental Justice:

The comments regarding environmental justice are addressed in detail in the Planning Commission staff report (Exhibit 1a). The permitting process for this facility expansion is in compliance with environmental justice principles and has not been applied in any way to focus pollution burden or discriminate against any group of individuals.

The project site lies within a census tract that has been identified as a “disadvantaged community” by the CalEnviroScreen mapping tool developed by CalEPA to help target communities for investment of a portion of the proceeds from the state’s cap-and-trade program for greenhouse gas emissions. Upon its creation, CalEPA provided guidance for the use of the tool that outlined both its applicability and limitations. Specifically, CalEnviroScreen tool is not intended to restrict the authority of government agencies in permit and land-use decisions, and is not a substitute for cumulative impacts analysis under CEQA. Additionally, the tool considers some social, health, and economic factors that may not be relevant when doing an analysis under CEQA.

The County’s standard discretionary permitting process that has been applied to the proposed project involves an assessment of consistency with the County General Plan,

a determination of compliance with the Zoning Ordinance and the evaluation of environmental impacts pursuant to CEQA. Access to and development of finite natural resources such as aggregate minerals and oil and gas deposits are not focused on any specific population demographic or surface development, but on the fixed-in-place location of the resource itself.

All public commentary on this issue received by the Planning Division has been provided to the Board for its consideration.

SUMMARY

The letter does not provide or constitute substantial evidence that the proposed project may have a significant effect on the environment requiring the preparation of an EIR. The letter also does not identify any inconsistency of the proposed project with a land use policy or regulation. The staff recommendation that the project be approved remains unchanged.

Attachment: Copy of form comment letter

Luke, Bonnie

From:

Sent:

To:

Subject:

Luke, Bonnie

[External] Reject the RenPet Expansion Project

Dear Luke,

I am writing in support of Food & Water Watch's and Climate First Replacing Oil & Gas (CFROG)'s appeal of PL14-0103, Renaissance Petroleum's proposal to expand drilling near my community. I'm asking you to do your duty and put public health before corporate profit by granting the appeal and sending the project back to the planning department.

These new oil wells and oil processing hub will be within 1,600 feet of residents' homes and within 2 miles of 8 Oxnard schools. There should be a full and complete public health impact analysis that is site specific, with direction to consider environmental justice issues because the project is located in a state-identified disadvantaged community.

This community has already suffered from years of pollution from pesticides and the oil industry. According to the State of California, residents in this area are in the top 100th percentile for pesticide pollution, 97th percentile for impaired water and 91st percentile for pollution burden.

Drilling sites like these produce harmful chemicals which can affect people's reproductive and central nervous systems; and ethylbenzene and xylenes which may have respiratory and neurological effects. The proposed processing facility will also flare more gas, emit air pollution, and require a significant number of trucks to transport crude oil. These trucks will be using the same routes as many of the residents and school buses.

Residents deserve the right to know how the expansion of the Cabrillo Oil Field to an approved total of 20 oil wells and a large oil, water, and gas processing hub will affect the health our families for thirty more years.

I urge you to protect the Oxnard community by supporting Food & Water Watch's and CFROG's appeal, rejecting RenPet's expansion proposal, and further studying the cumulative impacts of these wells before granting permits that will impact the area for decades to come.

Sincerely,