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VIA EMAIL (clerkoftheboard@ventura.org)

November 9, 2020

Clerk of the Board of Supervisors
Ventura County
800 S. Victoria Avenue
Ventura, California 93009
Email: clerkoftheboard@ventura.org

Re: Recommendation of Supervisors Bennett and Parks to Direct the Resource Management Agency to Return to the Board by June 2021 with Zoning Ordinance Amendments to Limit Discretionary Permits for Oil and Gas Operations to Fifteen Years, to Increase the Amount of the Compliance/Site Restoration Surety, and to Incorporate Measures to Assure the Timely Permanent Plugging and Restoration of Wells that Have Been Idle for Fifteen Years or More – Agenda Item 34

Dear Members of the Ventura County Board of Supervisors:

On behalf of California Resources Corporation (“CRC”), we join in the comments submitted by Western States Petroleum Association (“WSPA”) on November 9, 2020 concerning its serious concerns regarding the Supervisors’ Recommendation posted as Agenda Item #34. As detailed in WSPA’s letter to the Board, the Recommendation of Supervisors Bennet and Parks makes inaccurate statements and assumptions about the oil industry; unlawfully attempts to regulate downhole activities in a manner that is preempted by state law; is premature in failing to wait for a conclusion of the Planning Commission’s report and investigation into the status of abandoned and idle oil and gas wells; and its blanket policy limiting new discretionary oil and gas permits to fifteen years is arbitrary.

The Recommendation follows the County’s recent adoption of its General Plan Update and is being considered concurrently with proposed amendments to the Coastal and Non-Coastal Zoning Ordinances. The County’s onslaught of job-killing restrictions on the oil and gas industry will have devastating impacts on an industry that is critical for economic growth during a global pandemic. Indeed, during this COVID-19 pandemic, California’s state and local governments have declared oil and natural gas producers essential to power homes and hospitals and supply food and other daily necessities.¹ Oil and gas are also critical to the production of a vast

¹ Powering California, How Oil & Natural Gas are Helping Fight COVID-19, available at, <https://poweringcalifornia.com/3192-2/>.

majority of pharmaceuticals, medical equipment, and personal protective gear.² From latex gloves to hand sanitizer to examination tables, petroleum products are essential items for patients and healthcare workers.³

These restrictions on local oil and gas production will also increase the County's and State's reliance on foreign oil. California is the second-largest consumer of petroleum products in the nation and the largest consumer of motor gasoline and jet fuel.⁴ As the State and local governments wage wars on in-state production, our reliance on foreign oil has increased. In 2019, foreign crude oil accounted for 58.4 percent of the feedstock for Californian refineries last year, according to data from the California Energy Commission.⁵ This translated into an average of almost 359,712 barrels per day (bpd). Locally produced oil accounted for 29.7 percent, or 183,158 bpd, with the remainder coming from Alaska.⁶

This increase in imports from foreign countries will result in significant environmental effects, including corresponding increases in greenhouse gas emissions, that have not been analyzed by the County. Oil production from Ventura County has a lower carbon intensity than any of the foreign countries that make up the majority of imported oil.⁷

As the State and County grapple with a global pandemic that has taken lives and killed jobs, the Board of Supervisors should be focused on rebuilding the local economy and ensuring the safety, health, and welfare of its citizens. Agenda Item 34 would have the opposite effect. Accordingly, CRC urges the Board of Supervisors to deny the Recommendation of Supervisors Bennet and Parks.

Sincerely,



Matt Wickersham

² *Id.*

³ *Id.*

⁴ California accounted for one-fifth of the nation's jet fuel consumption in 2018. See U.S. Energy Information Administration, California State Profile and Energy Estimates, available at <https://www.eia.gov/state/?sid=CA>.

⁵ California Energy Commission, Oil Supply Sources to California Refineries, available at <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries>.

⁶ *Id.*

⁷ California Air Resources Board, Calculation of 2019 Crude Average Carbon Intensity Value, available at https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/crude-oil/2019_crude_average_ci_value_final.pdf.