

Key, Lori

From: Robert McDonough [REDACTED] >
Sent: Sunday, November 8, 2020 11:01 AM
To: Bennett, Steve; Parks, Linda; Long, Kelly; Supervisor Huber; Zaragoza, John; ClerkoftheBoard
Subject: Fw: Legacy permits and vested rights

Clerk of the Board of Supervisors
800 S. Victoria Avenue
Ventura, CA 93009

RE: Item 34 of REGULAR MEETING AGENDA for November 10, 2020

Dear Sirs and Madams,

I'm writing to your attention in order to protest and establish my opposition to the proposed action of modifying the rights of lease and royalty owners legacy permits and vested rights. These are deeded rights and as such are real property and by law can only be taken through the Condemnation and Eminent Domain process and relevant laws. I believe that a yes vote on your part is irresponsible and a violation of your fiducial responsibility to the people of Ventura county for the following reasons:

1. The Oil Industry is a major employer in Ventura County and has been an established industry for nearly 100 years. These are good paying jobs. This would be devastating to the local energy workers, raise cost for producers, and discourage investment in future projects insuring the demise of this vital segment of our economy.
2. With current unemployment rate for the County at around 9% and the prospect of a shutdown of local oil and gas operations due to the proposed amendments affecting legacy permits many residents will be forced to leave the vicinity. This will affect County tax base to the potential loss of up to \$56 million annually which will be passed through to the remaining residents, real estate value, school enrollment, and demographics in general.
3. "If it isn't broke, don't fix it". There has been no evidence that the current system is not working. These Legacy permits are strictly regulated by over 25 Federal, State and local regulatory agencies through the current rules, policies, and enforcement protocols. There is no reason to change the current system.
4. This will not change demand for oil, so producing less in Ventura County will only mean that it will be acquired elsewhere. Thus, this action will have the effect of destroying the industry in Ventura County and promoting it elsewhere at our monetary expense and further destroy the environment by encouraging production in less regulated areas.
5. This action would be contrary to the County General Plan. Section 4.12 of the County General Plan's environmental impact report notes, "an increase reliance on imports" due to the policies restricting local production.
6. As stated above, our opinion is that this constitutes an illegal "Taking" which opens the County to legal actions with potential downside liabilities in the hundreds of millions of dollars and no potential upside gain.

Best Regards,
Robert McDonough
Southfork Ranch LLC