

# **VC BOARD OF SUPERVISORS MEETING OF 2/28/23**

## **AGENDA ITEM #72 - HEARING FOR CASES:**

**PL22-0152 (ZC22-0937)**

**PL22-0153 (ZC22-0938)**

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### **ABA Energy Corporation**

**2/28/23**



**MY NAME IS AL ADLER – MY ADDRESS IS 7612 MEANY AVENUE – BAKERSFIELD CA.**

**GOOD AFTERNOON CHAIRMAN LA VERE, VICE CHAIR LONG, AND SUPERVISORS PARVIN, GORELL, AND LOPEZ AND, GOOD AFTERNOON TO PLANNING STAFF AND EVERYONE WORKING HERE TODAY.**

**TODAY I AM GOING TO FIRST GIVE YOU A QUICK OVERVIEW OF ABA & THE MAULHARDT RANCH VERBALLY & WITH PICTURES, I WILL THEN REVIEW THE HISTORY OF THE ZCs WE ARE APPEALING TODAY, I WILL THEN DISCUSS THE PERMITS, ORDINANCES, AND PROCESSES AFFECTING THIS APPEAL, AND FINALLY, AND WILL DISCUSS OUR GROUNDS OF APPEAL BASED ON THE FOREGOING.**

**I AM THE OWNER OF ABA ENERGY CORPORATION & OVER THE PAST 32 YEARS, ABA HAS DRILLED AND OPERATED MANY WELLS IN CALIFORNIA FROM CHICO TO OXNARD.**

**THE MAULHARDT FAMILY RANCH HAS BEEN FARMED SINCE 1891. OIL AND GAS OPERATIONS STARTED IN 1957 WHEN TIDEWATER & GETTY DRILLED THE MAULHARDT #1 WELL WHICH IS STILL PRODUCING PROFITABLY TODAY.**

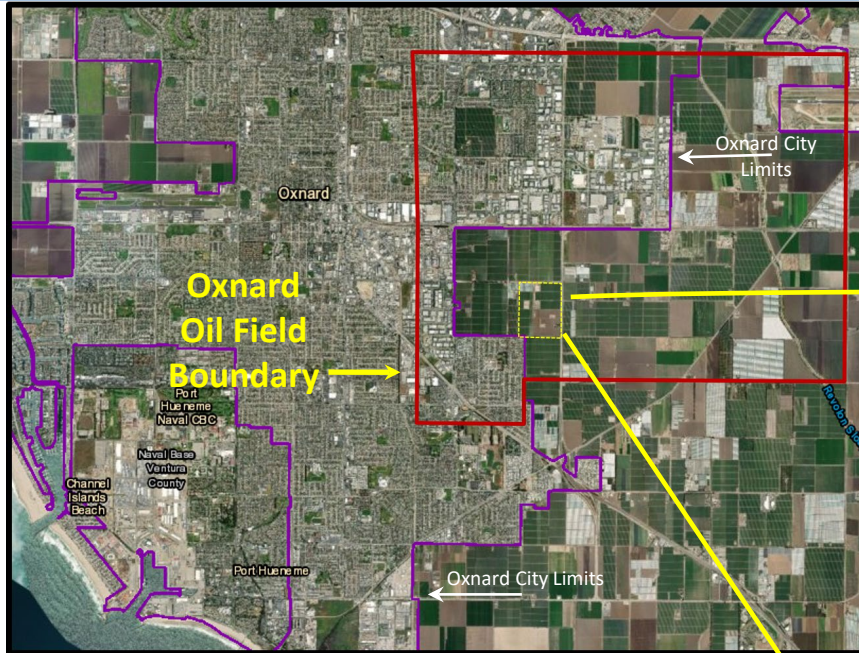
**IN 1971, 14 YEARS AFTER OIL PRODUCTION BEGAN, CONSTRUCTION COMMENCED IN THE LEMONWOOD HOUSING DEVELOPMENT SITUATED ON THE SW EDGE OF THE MAULHARDT RANCH. THE FIRST SCHOOL WAS BUILT THERE IN 1981.**

**AFTER YEARS OF HECTIC OIL & GAS ACTIVITY, THE MAULHARDT RANCH WAS DOWN TO 1 PRODUCING WELL IN 2010 WHEN ABA ACQUIRED THE MAULHARDT LEASE AND SUP #672 FROM VINTAGE PETROLEUM.**

**ABA HAS BEEN VERY ACTIVE ON THE MAULHARDT RANCH SINCE 2010 AND HAS INSTALLED CONTAINMENT BARRIERS AROUND ALL OF THE NEW TANKS & FACILITIES, RE-VAMPED THE ELECTRICAL SYSTEM, INSTALLED BRAND NEW PIPELINES, AND HAS DRILLED 21 NEW WELLS. THE ZC APPROVALS BEFORE YOU TODAY VIA APPEAL ARE 2 SIDETRACK DRILLING PROJECTS WHICH USE EXISTING WELLS (JM #9 AND THE DM #2). A VISUAL OVERVIEW OF THESE 2 WELLS AND ABA'S OVERALL OPERATIONS ARE SHOWN ON THE NEXT 4 SLIDES.**

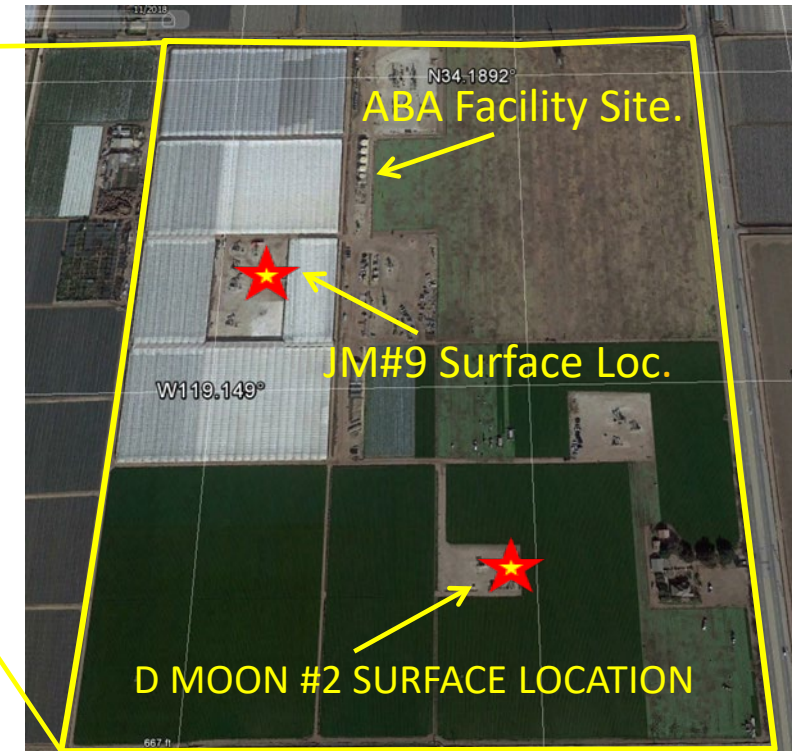


# GENERAL PROJECT SETTING: JM#9 ST AND DM#2 ST



Modified Image from California Division of Oil and Gas website

Location Map of Oxnard Field and Maulhardt Lease ~127 Acres



Google Earth 11/19/2018  
image of Maulhardt Lease (+/-  
127 acres)

ABA  
Oxnard  
Tank  
Farm  
and  
Facilities





# GENERAL VIEW OF ABA'S NEW MAULHARDT LEASE FACILITIES

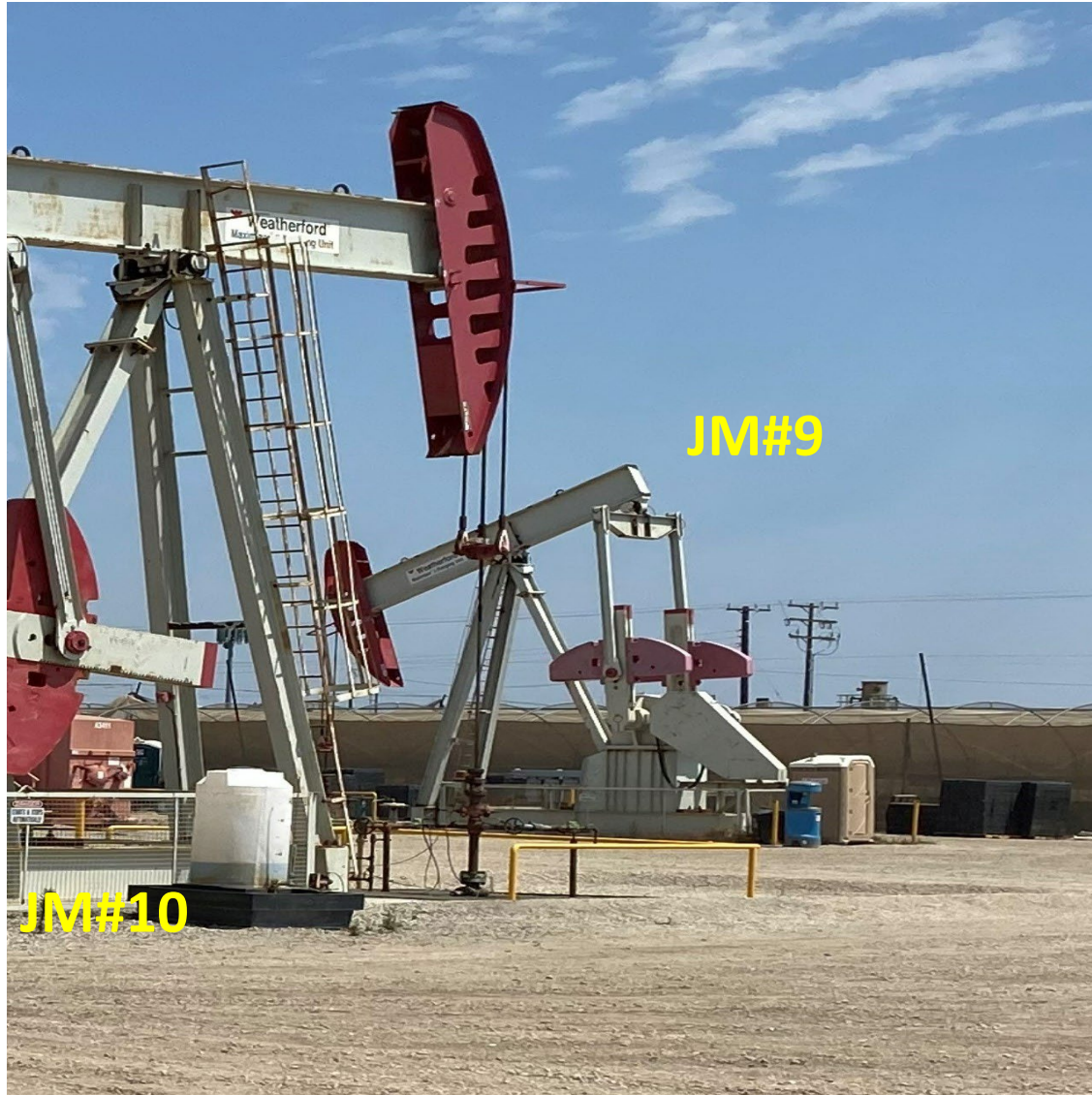


# PROJECT OFFSET OVERVIEW: JM#9 ST AND DM#2 ST

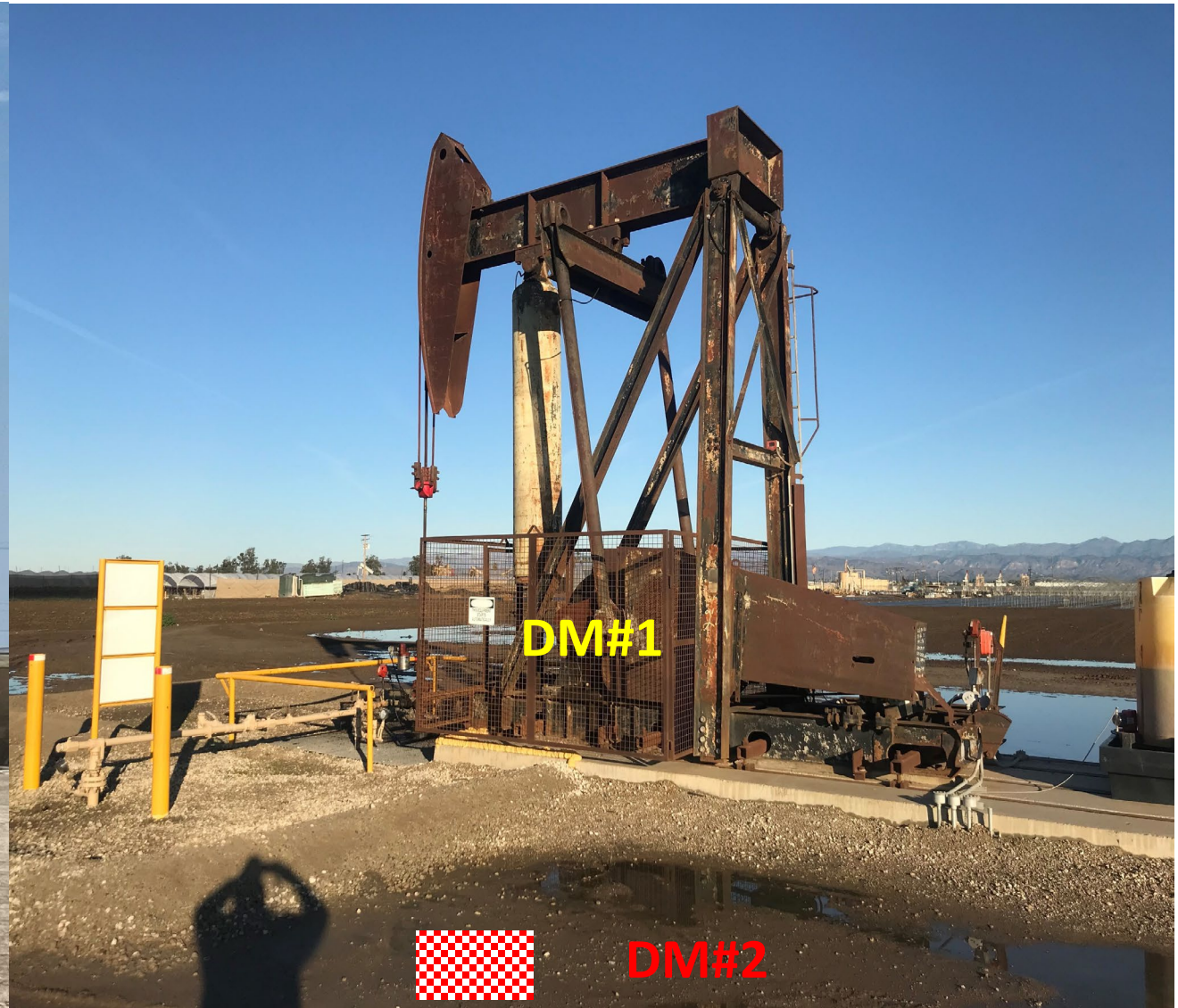




# JM#9 ST AND DM#2 ST WELL SETTING – EXISTING ROCKED PADS



**JM#9**



**DM#1 AND PAD FOR DM#2 ST**

**ON SEPTEMBER 22, 2022, THE PLANNING DIRECTOR ISSUED ABA TWO “ZONING CLEARANCES” STYLED ZC22-0937 AND ZC22-0938 FOR THE RE-DRILLING AND SUBSEQUENT OPERATION OF TWO EXISTING OIL WELLS LOCATED IN THE OXNARD OIL FIELD (JM#9 AND THE DM#2 WELLS) BOTH WELLS TO BE RE-ENTERED HAD ORIGINALLY BEEN ISSUED ZCS AT THE TIME OF ORIGINAL DRILLING.**

**ON SEPTEMBER 30, 2022, THE ISSUANCE OF THE ZONING CLEARANCES WAS APPEALED BY CLIMATE FIRST: REPLACING OIL & GAS (“CFROG”) TO THE VENTURA COUNTY PLANNING COMMISSION.**

**ON OCTOBER 13, 2022, ABA EMAILED A LETTER TO PLANNING STAFF SETTING OUT THE REASONS WHICH ABA BELIEVED RENDERED MOOT CFROG’S APPEALS.**

**ON OCTOBER 20, 2022, ABA RECEIVED A RESPONSE TO THE OCTOBER 13, 2022 LETTER WHICH STATED THAT THE COUNTY WOULD NOT DISMISS THE APPEALS DESPITE THE FACTS DISCUSSED IN ABA’S LETTER.**



FOR THE DECEMBER 15, 2022 PLANNING COMMISSION PUBLIC HEARING WHICH WAS CONVENED TO CONSIDER THE CFROG APPEALS, THE PLANNING DIRECTOR ISSUED A STAFF REPORT IN SUPPORT OF ABA WHICH WAS A LEGAL FINDING THAT ABA WAS IN COMPLIANCE WITH SUP #672 AND AFFIRMING THEIR ISSUANCE OF THE ZONING CLEARANCES.

NOTWITHSTANDING THIS STAFF REPORT, THE MOTION MADE BY THE PLANNING COMMISSION TO APPROVE THE STAFF REPORT AND THEREBY AFFIRM ABA'S PREVIOUSLY APPROVED ZONING CLEARANCES (AND DENY CFROG'S APPEAL) FAILED ON A 3-2 VOTE.

THUS, THE PLANNING COMMISSION REJECTED THE PLANNING DIRECTOR'S STAFF REPORT, REJECTED ABA'S TESTIMONY, AND MOREOVER REJECTED THE ADVICE OF COUNTY COUNSEL JEFF BARNES MADE ON THE RECORD BY DECLINING TO VOTE FOR ISSUANCE OF MINISTERIAL ZONING CLEARANCES.

BASED ON THE FOREGOING, ABA FILED "APPEALS" ON 12/22/22 FOR THE AFFECTED ZCS.

PURSUANT TO THE FOLLOWING FACTS, ABA URGES THE VENTURA BOARD OF SUPERVISORS TO NOW AFFIRM AND ACCEPT THE PLANNING DIRECTOR'S STAFF REPORT DATED 2/28/23 FOR THIS HEARING AND THEREBY GRANT ABA'S APPEALS AND UPHOLD THE APPROVAL OF THE ZONING CLEARANCES IN COMPLIANCE WITH COUNTY, STATE, AND FEDERAL LAW.

**AS PREVIOUSLY NOTED, ABA ACQUIRED THE MAULHARDT LEASE AND SUP #672 IN 2010.**

**SUP #672 WAS ISSUED IN 1957 AS A DISCRETIONARY PERMIT AND APPLIES TO THE MAULHARDT FAMILY RANCH (~127 ACRES) AT THE CORNER OF RICE AVENUE AND WOOLEY ROAD IN OXNARD.**

**SUP #672 WAS ISSUED DURING A PROPERLY NOTICED PUBLIC HEARING AFTER A MAJORITY OF THE VC BOARD OF SUPERVISORS VOTED TO APPROVE SUP #672 WHICH WAS ALSO APPROVED IN ACCORD WITH THE PREVAILING REGULATIONS, AS WELL AS PERSUANT TO THE CONDITIONS AFFIRMATIVELY VOTED UPON BY THE PLANNING COMMISSION.**

**THE VC NCZO OPERATES SUCH THAT ONCE THE DISCRETIONARY SUP IS OBTAINED (AS ABA HAS FOR SUP #672), ABA NEED ONLY TO OBTAIN A ZONING CLEARANCE FOR EACH WELL ABA DESIRES TO DRILL SUBJECT TO SUP #672. PER THE VC NCZO INCLUDING ARTICLE 11 THEREOF (INCLUDING SECTION 8111-1.1), A ZONING CLEARANCE FOR ANY WELL DRILLED UNDER SUP #672 IS MINISTERIAL, AND IS NOT A PERMIT PER SE, BUT RATHER A CERTIFICATION PROCESS WHICH ENSURES/DEMONSTRATES THAT ABA IS IN COMPLIANCE WITH SUP #672 AT THE TIME OF THE ZC APPLICATION SUBMITTAL (WITH RESPECT TO ITS CURRENT OPERATIONS), AND THE ZC ALSO EVALUATES ABA'S ZC APPLICATION FOR COMPLIANCE WHILE UNDERTAKING THE OPERATION DESCRIBED IN THE ZC APPLICATION.**



THE DEFINITION OF “MINISTERIAL” PER THE NCZO IS FOUND AT SEC. 8111-1.1 – “MINISTERIAL ENTITLEMENTS.....**ARE GRANTED BASED UPON DETERMINATIONS, ARRIVED AT OBJECTIVELY AND INVOLVING LITTLE OR NO PERSONAL JUDGMENT, THAT THE REQUEST COMPLIES WITH ESTABLISHED STANDARDS SET FORTH IN THIS CHAPTER.....**”.

THE NCZO DEFINITION ABOVE FOR MINISTERIAL IS SIMILAR TO THE DEFINITION FOUND IN THE CEQA GUIDELINES § 15369, THAT “MINISTERIAL” **“DESCRIBES A GOVERNMENTAL DECISION INVOLVING LITTLE OR NO PERSONAL JUDGMENT BY THE PUBLIC OFFICIAL AS TO THE WISDOM OR MANNER OF CARRYING OUT THE PROJECT. THE PUBLIC OFFICIAL MERELY APPLIES THE LAW TO THE FACTS AS PRESENTED BUT USES NO SPECIAL DISCRETION OR JUDGMENT IN REACHING A DECISION. A MINISTERIAL DECISION INVOLVES ONLY THE USE OF FIXED STANDARDS OR OBJECTIVE MEASUREMENTS”**

**BASED ON THE FOREGOING NCZO DEFINITION FOR MINISTERIAL, THE MINISTERIAL EVALUATION STANDARD BECOMES QUITE CLEAR WITH RESPECT TO, FOR INSTANCE, CONSIDERING A ZONING CLEARANCE FOR APPROVAL. SPECIFICALLY, THE “ESTABLISHED STANDARDS” REFERENCED IN THE ABOVE NCZO DEFINITION ARE THE 10 ITEMS SET OUT IN SECTION 8111-1.1.1B WHICH CONVENIENTLY INCLUDES ITEM (3) WHICH REQUIRES A FINDING OF WHETHER OR NOT ABA IS IN COMPLIANCE WITH ALL 13 CONDITIONS OF SUP #672 . AND FINALLY, THESE ESTABLISHED STANDARDS MUST BE ARRIVED AT OBJECTIVELY AND INVOLVING LITTLE OR NO PERSONAL JUDGEMENT. THE CEQA DEFINITION LENDS INSIGHT TO THE PROHIBITION OF USING LITTLE OR NO PERSONAL JUDGEMENT BY ADDING THE EASILY UNDERSTOOD RULE THAT WOULD PROHIBIT A REVIEWER OF FACTS FROM MAKING A JUDGEMENT “AS TO THE WISDOM OR MANNER OF CARRYING OUT THE PROJECT.” IT SHOULD ALSO BE POINTED OUT THAT SUBJECT TO THE FOREGOING DEFINITIONS, A REVIEWER OF FACTS (SUPERVISOR, COMMISSIONER, PLANNING STAFF, ETC.) IS PROHIBITED FROM CHANGING THE EXISTING CONDITIONS OF A PERMIT NOR IMPOSING NEW CONDITIONS.**

**WHY ARE WE HERE TODAY?**

**THE MATTER BEFORE YOU TODAY IS QUITE STRAIGHTFORWARD GIVEN THAT ZC APPROVALS ARE MINISTERIAL.**

**MINISTERIAL ACTS ARE NOT DISCRETIONARY AND PER SECTION 8111-1.1 OF THE NCZO, SUCH ACTS SIMPLY INVOLVE A REVIEW OF THE 10 ITEMS SET OUT IN SECTION 8111-1.1.1B AND A DETERMINATION THAT ABA IS IN COMPLIANCE THEREWITH, WHICH DETERMINATION INCLUDES A REVIEW AND FINDING OF WHETHER OR NOT ABA IS IN COMPLIANCE WITH ALL 13 CONDITIONS OF SUP #672.**

**IF A FINDING IS MADE THAT ABA IS IN COMPLIANCE WITH THESE 10 ESTABLISHED NCZO STANDARDS, AND SUCH A FINDING IS ARRIVED AT OBJECTIVELY AND INVOLVING LITTLE OR NO PERSONAL JUDGEMENT, THEN THE ZONING CLEARANCES SHALL BE APPROVED.**

**AT THE DECEMBER 15, 2022 PLANNING COMMISSION PUBLIC HEARING CONVENED TO CONSIDER THE CFROG APPEALS, THE PLANNING DIRECTOR ISSUED A STAFF REPORT IN SUPPORT OF ABA WHICH WAS A LEGAL FINDING THAT ABA WAS IN COMPLIANCE WITH THE 10 ESTABLISHED ITEMS SET OUT IN SECTION 8111-1.1.1B OF THE NCZO AS WELL AS THE 13 CONDITIONS OF SUP #672. NOTWITHSTANDING THIS STAFF REPORT, THE MOTION MADE BY THE PLANNING COMMISSION TO APPROVE THE STAFF REPORT AND THEREBY AFFIRM ABA'S PREVIOUSLY APPROVED ZONING CLEARANCES (AND DENY CFROG'S APPEAL) FAILED ON A 3-2 VOTE. THIS OUTCOME VIOLATES THE COUNTY'S NCZO.**



# GROUNDS FOR APPEAL

THUS, DESPITE THE LAW PROVIDING THE STANDARD OF CARE TO USE LITTLE OR NO PERSONAL JUDGEMENT IN MAKING THEIR VOTING DECISION, DESPITE THE PLANNING DIRECTOR'S STAFF REPORT, AND DESPITE ABA'S TESTIMONY, AND MOREOVER AGAINST THE ADVICE OF COUNTY COUNSEL JEFF BARNES, **THE PLANNING COMMISSION VIOLATED THE COUNTY'S OWN REGULATION (NCZO) BY DECLINING TO ISSUE THE REQUESTED MINISTERIAL ZONING CLEARANCES.**

FURTHER EVIDENCE IN CONTRAST TO THE PLANNING COMMISSION'S DUTY TO USE LITTLE OR NO PERSONAL JUDGEMENT IN MAKING THEIR VOTING DECISION WAS ABUNDANT DURING THE TIME STAMPS OF ~3:43 – 3:57 OF THE OF THE PLANNING COMMISSION HEARING VIDEO. A SAMPLE OF A FEW OF THE STATEMENTS MADE DURING THIS ~14 MINUTE PERIOD WERE "JUST BECAUSE ITS MINISTERIAL DOESN'T MEAN OUR HANDS ARE TIED", "I DON'T THINK IT SENDS THE RIGHT MESSAGE", "I'D LIKE TO SEE MORE STUDIES", "I UNDERSTAND WHAT WE'RE DOING BUT I DON'T FEEL GOOD ABOUT IT", "IT'S JUST NOT RIGHT", "JUST BECAUSE GOING BY THE BOOK MEANS YOU DON'T HAVE TO (DO MORE ENVIRONMENTAL STUDIES), DOESN'T MEAN ABA SHOULDN'T DO THEM". CONCERNS WERE ALSO RAISED REGARDING ENVIRONMENTAL JUSTICE (~3:45) AND THAT ABA HAD NOT STUDIED IT (EVEN THOUGH THE COMMISSION WAS ADVISED THAT LEMONWOOD HAS NOT BEEN DESIGNATED AS A DISADVANTAGED COMMUNITY AND IT IS THE CITY OF OXNARD'S RESPONSIBILITY TO EVALUATE, NOT THE COUNTY'S.

AN IRRESPONSIBLE VOTE ON THIS MATTER IN STARK CONTRAST TO THE EFFORT THAT PLANNING STAFF EXPENDED TO DO THEIR EVALUATION CORRECTLY. PLANNING STAFF IS "HANDS ON" AND INCLUDED FIELD VISITS, MANY QUESTIONS, AND A STRICT EVALUATION OF THE 10 ITEMS SET OUT IN SECTION 8111-1.1.1B.

## MISCELLANEOUS INFORMATION REGARDING CLAIMS

- IT HAS BEEN CLAIMED BY CERTAIN PARTIES THAT AN INITIAL STUDY AND ENVIRONMENTAL REVIEW IS REQUIRED UNDER CEQA FOR THE ZONING CLEARANCES, BUT CEQA DOES NOT APPLY HERE. CEQA IS ONLY TRIGGERED WHEN THERE IS A DISCRETIONARY ACT. THE APPEALS MISREPRESENT THE COUNTY'S ORDINANCES AND REFERENDUM HISTORY
- THE COUNTY ATTEMPTED TO MAKE PERMITS LIKE SUP #672 DISCRETIONARY AS TO NEW WELLS BUT THE REFERENDUM LAST YEAR VOIDED SUCH AN ACTION.
- IT HAS BEEN ARGUED BY SOME THAT THE ISSUANCE OF THE SUBJECT ZONING CLEARANCES IS IN VIOLATION OF STATE LAW, BUT THE ONLY LAW CITED IN SUCH AN ARGUMENT (ASIDE FROM CEQA CLAIMS WHICH ARE NOT APPLICABLE AS DISCUSSED ABOVE) IS SB1137 WHICH IS CURRENTLY MOOT SUBJECT TO THE NOVEMBER 2024 ELECTION.
- PRIOR TO THESE APPEALS, ABA HAS ALWAYS RECEIVED ZONING CLEARANCES IN A MINISTERIAL FASHION. AS TO ALL OF ABA'S PERMITS, COUNTY, STATE, APCD, ETC., ABA HAS NEVER BEEN ADVISED THAT IT IS NOT IN COMPLIANCE.



## MISCELLANEOUS INFORMATION REGARDING CLAIMS


- **OVER THE YEARS, ABA'S SUP #672 HAS ON MANY OCCASIONS BEEN PUBLICLY DESCRIBED AS BEING AN "OLDER PERMIT" WHICH "LACKS ANY MODERN STANDARDS FOR ENVIRONMENTAL PROTECTION", A "COWBOY PERMIT", AN "ANTIQUATED PERMIT", AND MANY OTHER SIMILAR MONIKERS. ONCE AGAIN, ABA WOULD LIKE TO DEMONSTRATE THAT THESE DESCRIPTIONS ARE PATENTLY FALSE. DUE TO ABA'S SUP #672 CONDITIONS, AS WELL AS BY AUTOMATIC/SELF-CORRECTING MECHANISMS, ABA ADHERES TO THE UPDATED AND MOST RECENT NCZO REGULATIONS, CALGEM PERMIT CONDITIONS/REGULATIONS, VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT ("APCD") RULES, CARB STANDARDS, AND NUMEROUS OTHER LAWS AND REGULATIONS AFFECTING OPERATIONS, ALL OF WHICH ARE UPDATED THROUGH TIME AND ARE COLLECTIVELY AND PROGRESSIVELY MORE RESTRICTIVE AND RESULT IN A CLEANER OPERATION.**
- **ACCORDINGLY, BY DEFINITION, THE NCZO (WHICH APPLIES TO ABA'S OPERATIONS) IS CONTINUOUSLY UPDATED AND THEREBY, SO ARE THE STANDARDS. CURRENTLY, THE NCZO DICTATES STANDARDS, WHICH ARE ROUTINELY UPDATED, FOR SETBACK REQUIREMENTS, NOISE ATTENUATION, DUST CONTROLS, PUMPING UNIT AND PAD DESIGN, FLOOD PLAIN COMPLIANCE, SEPTIC SETBACK COMPLIANCE, SOILS CLEARANCE, AND APCD COMPLIANCE.**
- **ADDITIONALLY, ABA'S COMPLIANCE WITH THE APCD REGULATIONS INCLUDES, BUT IS NOT LIMITED TO, PARTICIPATION IN THE VCAPCD PROGRAM WHICH PROVIDES FOR EMISSION REDUCTION CREDITS OR "ERCS" (WHICH IS A VENTURA CAP-AND-TRADE PROGRAM), DRILLING RIG EMISSION REVIEW, PRODUCTION EQUIPMENT APPROVAL, AS WELL AS AN INSPECTION PROTOCOL. ALL OF THE FOREGOING AIR QUALITY REGULATIONS ARE CONSTANTLY UPDATED AND TIGHTENED.**

- 1. ABA'S USE AND APPLICATION OF ACQUIRED ERCS (CAP AND TRADE).
- ,2. ABA'S INSTALLATION OF A BACT FLARE ON THE MAULHARDT LEASE (FLARE EMISSIONS DIWN BY 92%).
- 3. ABA'S VAPOR RECOVERY SYSTEM WHICH HAS A ROBUST MECHANISM TO REMOVE GASES FROM THE OIL/FLUID TANKS AND ROUTES SAME TO THE FLARE SYSTEM.
- 4. ABA'S PARTICIPATION IN THE "LDAR" PROGRAM WHICH IS A VOLUNTARY LEAK DETECTION AND REPAIR PROGRAM WHERE ABA REGULARLY SELF-TESTS EACH POTENTIAL SOURCE OF FUGITIVE EMISSIONS.
- 5. ALL ENGINES USED ON DRILLING RIGS NOW HAVE TO BE CARB CERTIFIED. THIS IS YET ANOTHER MAJOR IMPROVEMENT IN AIR QUALITY DURING DRILLING. IF THE REGULATIONS WERE, AS CLAIMED BY SOME, TO BE STUCK IN 1957, THIS IMPROVEMENT WOULD NOT BE IN EFFECT. 6.

- 1. EACH YEAR, THE APCD CALCULATES THE EFFECTS OF ABA'S FACILITIES ON THE AIR QUALITY FOR THE SENSITIVE RECEPTORS NEAR THE MAULHARDT LEASE. THE LAST DATA MODEL WAS JUST RUN/CALCULATED IN EARLY JANUARY. BECAUSE OF ABA'S COMPLIANCE WITH THE AFOREMENTIONED APCD PROGRAM FACTORS AND ABA'S VIGILANCE ON ITS WELLS AND FACILITIES, ABA'S EMISSIONS WERE CALCULATED BY THE APCD TO BE FAR BELOW THE THRESHOLD DEEMED TO POTENTIALLY RESULT IN SIGNIFICANT HEALTH RISKS TO EXPOSED INDIVIDUALS AND IS DEEMED A "LOW PRIORITY" FACILITY. IN GENERAL, THE APCD RUNS THE MODEL FOR CARCINOGENIC EFFECTS, AND NON-CARCINOGENIC EFFECTS, AS WELL AS CHRONIC AND ACUTE AFFECTS. AND FOR EACH OF THESE RISKS, SCORES BETWEEN 10-100 ARE CONSIDERED AS A HIGH PRIORITY, SCORES BETWEEN 1-10 AS INTERMEDIATE PRIORITY, AND SCORES OF 0-1 AS LOW PRIORITY WHICH IS THE ONLY CATEGORY THAT REQUIRES NO ANNUAL HEALTH RISK ASSESSMENT REPORT. ABA'S HIGHEST SCORE FOR THE RISKS STATED ABOVE AT THE SOUTH EDGE OF THE MAULHARDT LEASE AND THE NORTHEAST CORNER OF THE LEMONWOOD DEVELOPMENT ARE 0.3619 AND THE LOWEST SCORE IS 0.0127, WITH BOTH SCORES BEING FAR BELOW THE TOP OF THE LOW PRIORITY RANGE OF 1.0. SEE DATA ON NEXT PAGE.



# MODERN ENVIRONMENTAL PROTECTION

 Facility Data Entry Screen

File Edit Previous Record Next Record Go To Settings Help

**Editing Facility - ID: 66 | ABA ENERGY CORP MAULHARDT LEASE OXNARD OILFIELD | Year: 2021**


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- Facility Address & Location
- Contact & Employee Info
- Building & Property Dimensions
- Release Data (10)
- Device Data (10)
  - Process Data (11)
    - Emission Data
      - Toxics (127)
      - Criteria (49)
      - Other (0)
- Area Designation
- Supplemental Data (0)
- Priority Calculation
- Fees & Reporting
- Additional Info
- Last Updated

Priority Calculation

Calculation Procedures

☒ Emissions and Potency Procedure ☒ Dispersion Adjustment Procedure

Receptor Proximity

Receptor Proximity (m)   [Help](#)

Proximity Method

Advanced Options

☒ Apply Priority, Proximity, and Noncancer Adjustments

☐ Apply Noninhalation Adjustments (Multipathway Pollutants)  [Help](#)

Priority Score

**Highest Score**

**Score Breakdown**

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Noncancer Priority Score, Emissions and Potency Procedure	<input type="text" value="0.3375"/>
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# MODERN ENVIRONMENTAL PROTECTION



- **ABA URGES THE BOARD OF SUPERVISORS TO AFFIRM STAFF'S RECOMMENDATION AND APPROVE ABA'S ZONING CLEARANCES.**
- **ANY OTHER RESULT WOULD MEAN A VIOLATION OF THE COUNTY'S ORDINANCE (NCZO) AND WILL BE A TAKING AS TO ABA AND THE MAULHARDT FAMILY.**