June 8, 2017

Mr. Stephen Onstot, Chair
And all Commissioners
Ventura County Planning Commission
800 Victoria Avenue
Ventura, CA 93003

Re: Work Session: Background Report/Vision & Guiding Principles for GenPlan Update

Dear Chair Onstot and Commissioners,

In addition to our Background Comment letter dated April 14, 2017 we are submitting this letter with additional comments.

CFROG is recommending a critical change to the County’s Guiding Principles related to the General Plan Update. As the County is no doubt aware, the California legislature passed SB1000 in 2016, which contains an extensive requirement for General Plans related to Environmental Justice. We do not believe that this important element is adequately addressed in the current set of guiding principles, and recommend the following:

1) An Environmental Justice principle must be added to the list of Guiding principles which states that the County seeks to ensure the protection of residents in disadvantaged communities from disproportionate burdens related to pollution, noxious industries, and risks of environmental hazards, (Health and Safety).

2) The public health principle should incorporate environmental justice concerns by being revised as follows: Promote economic, social, and physical health and wellness by encouraging walking and biking; ensuring equitable access to parks, public transit, and healthy foods; and integrating Health in All Policies into the built environment. (Healthy Communities)
CFROG is particularly concerned that low income communities, already impacted by pollution from pesticides and heavy truck traffic, will have those impacts compounded by expanding oil and gas projects. Science is showing that negative health impacts from small amounts of pollution are amplified for people who are already overburdened by exposure to pollution.

Impact studies are critically important, as is the County’s commitment to address the inequality and injustice in these situations. Part of that commitment is accurately identifying “Disadvantaged Communities,” in the Background Report, a definition broadened by SB1000. All communities meeting that definition should be included, and staff must use the most up-to-date data in making those identifications.

In this regard, expanding oil and gas operations in the mountains behind Piru are impacting air quality, and increasing potential for impacts. The full extent of current impacts from these, and all sources must be stated in the Background Report. In Somis, residents are concerned about aging pipelines. Natural gas and oil pipelines found running under an elementary school playground have prompted the school district to move the school. A report estimated that from half to all of the people on campus would be killed by an explosion. Compatibility between schools and residential communities, and oil and gas infrastructure is of particular concern in disadvantaged communities.

Note, however, that the current language in the Background Report on fracking anywhere in the County is misleading. First, no permits have been approved and executed since 2014. New technology and advances in fracking make today’s fracking unlike the process decades ago. If fracking is going to be mentioned in the report it should be fact based, and not appear, as the current language does, to be taken in large part from the Western States Petroleum Association website. Note also that any mention of fracking nationwide must be balanced to also include information about fracking bans, induced earthquakes, water contamination and issues related to injection of fracking waste. Finally, and contrary to current language, fracking will not lead to economic benefit for Ventura County. The industry has stated that fracking is not lucrative in Ventura, because the process had not yet unlocked the Monterey Shale.

These changes to the Background Report, and the inclusion of Environmental Justice language in the guiding principles are important first steps toward developing policy that protects the health of our most at risk populations, and the County as a whole.

Sincerely,

Kimberly Rivers
Executive Director