

June 25, 2025

Via electronic email

Kern County Board of Supervisors Kern County Administrative Office 1115 Truxtun Avenue, Fifth Floor Bakersfield, CA 93301 Supervisor Phillip Peters (district1@kerncounty.com) Supervisor Chris Parlier (district2@kerncounty.com) Supervisor Jeff Flores (district3@kerncounty.com) Supervisor David Couch (district4@kerncounty.com) Supervisor Leticia Perez (district5@kerncounty.com)

Re: Second Supplemental Recirculated Environmental Impact Report for Revisions to Title 19-Kern County Zoning Ordinance (2025-A) Focused on Oil and Gas Local Permitting (SCH # 2013081079)

To the Kern County Board of Supervisors:

We, the undersigned organizations respectfully submit this letter in reference to Kern County's proposed "Revisions to Title 19-Kern County Zoning Ordinance (2025-A) Focused on Oil and Gas Local Permitting" (Ordinance). We are writing to urge you to reject the Ordinance, which would fast-track the permitting of tens of thousands of new oil and gas wells for the coming decades, without adequate environmental review or mitigation and without further notice to, or input from, affected community members. Instead of looking for ways to accelerate oil and gas development and shield it from meaningful environmental review, County leaders should take steps to better protect the health and safety of local communities, enhance the County's long-term economic well-being, and promote a more sustainable future for Kern residents and all of California.

The Ordinance undermines sound government decision making and public transparency by purporting to authorize tens of thousands of new oil and gas wells and all related infrastructure based on a single, high-level, and inadequate environmental review. The Second Supplemental Recirculated Environmental Impact Report (SSREIR) does not analyze site-specific impacts, and yet the Ordinance and SSREIR are intended to deprive residents of future notice or opportunity to comment when permits are issued for operations in their communities.

Oil and gas development and industry operations already harm far too many people in Kern County, especially in low-income communities and communities of color. Research shows that when oil and gas development occurs near neighborhoods, or when the density of development is intensified, residents suffer increased rates of adverse health effects, including but not limited to increased risk of asthma, premature births, high-risk pregnancies, and cancer.

Even though Kern County residents already breathe the worst air quality in the country, the Ordinance and SSREIR aim to make it quicker and easier for new drilling to commence, threatening increased air

pollution that would exacerbate existing health harms. The SSREIR also acknowledges that the Ordinance will cause numerous other significant adverse impacts, like reducing available groundwater supplies, increasing disruptive noise, diminishing scenic views, harming wildlife, including endangered species and their habitat, and destroying valuable farmland.

The County's long-term interests would be better served by economic diversification and investment in cleaner and more sustainable development. The oil and gas industry in California has been in decline for many years, and there is a growing epidemic of orphan wells that—if industry has its way—will become the burden of the County and taxpayers to properly plug and decommission. Rather than promote this costly industry, the County should explore ways to create jobs for workers by requiring companies to perform oil well remediation and investing in efforts to diversify the County's economy.

Expediting approval of tens of thousands of new oil and gas wells also would be a disaster for California's climate future. In recent years, California has experienced extreme heatwaves and some of the worst fires in recorded history. These events are fueled by fossil fuel production and the resulting greenhouse gases emitted into our atmosphere. Continued oil and gas development will only accelerate and worsen these emissions and their climate change effects on public health, the economy, and our collective future.

For all these reasons, we ask the Board of Supervisors to **reject** the Ordinance. Instead, we believe the Board should adopt measures to improve health and safety protections for local residents and pave the way for a community- and worker-led transition to a more secure and sustainable economic base for the County.

Your consideration of these comments is much appreciated.

Sincerely,

Kayla Karimi	Anabel Marquez
Staff Attorney	President
The Center on Race, Poverty, and the Environment	Committee for a Better Shafter
Colin O'Brien	Estela Escoto
Deputy Managing Attorney	President
Earthjustice, California Regional Office	Committee for a Better Arvin
Paulina Torres	Diana Mireles
Staff Attorney	President
Natural Resources Defense Council	Commité Progreso Lamont
Hollin Kretzmann	Gloria Herrera
Senior Attorney	President
Center for Biological Diversity	Delano Guardians

Katie Huffling Executive Director Alliance of Nurses for Healthy Environments

Paul Paz y Mino Deputy Director Amazon Watch

Faraz Rizvi Policy and Campaign Manager Asian Pacific Environmental Network (APEN)

Tomas Valadez California Policy Manager Azul

Robert J van de Hoek Environmental Scientist Ballona Wetlands Institute

David F. Gassman co-convenor Bay Area-System Change not Climate Change

Gary Hughes Co-Director / Americas Program Coordinator Biofuelwatch

Tianna Shaw-Wakeman Environmental Justice Program Director Black Women for Wellness

Marie Venner Co-Chair Businesses for a Livable Climate

Neel Sannappa Senior Organizer CA Working Families Party

Aditi Varshneya Climate Justice Manager California Environmental Justice Alliance (CEJA) Action Pa Houa Lee Central Valley Regional Organizer California Environmental Voters

Barbara Sattler Leadership Council California Nurses for Environmental Health and Justice

Stefanie Klass Co-Chair CatholicNetwork US

Sarah Sharpe Deputy Executive Director Central California Asthma Collaborative

Nayamin Martinez Executive Director Central California Environmental Justice Network

Juan Lares Project Director Central Coast Climate Justice Network (C3JN)

Lisabeth Ryder Co-Chair CERBAT

Lynda Marin Chapter Lead Citizens' Climate Lobby Santa Cruz Chapter

Haley Ehlers Executive Director Climate First: Replacing Oil & Gas (CFROG)

RL Miller President Climate Hawks Vote

Dee Fromm Managing Director Coastal Lands Action Network Janelle London Co Executive Director Coltura

Tyler Earl Senior Staff Attorney Communities for a Better Environment

Liza Tucker Consumer Advocate Consumer Watchdog

Sheilah Fish Founder Contra Costa MoveOn

Marcia Hanscom Community Organizer Defend Ballona Wetlands

Jennifer Krill Executive Director Earthworks

Martin Bourque Executive Director Ecology Center

Todd Weber Volunteer, Chapter Co-Leader Elders Climate Action NorCal Chapter

Richard Burke Founder, Chapter Leader Elders Climate Action SoCal Chapter

Meghan Sahli-Wells California Director Elected Officials to Protect America

Leah Redwood Action Coordinator Extinction Rebellion San Francisco Bay Area Nicole Ghio California Director Food & Water Watch

lauren Ornelas Founder/General Programs Team Member Food Empowerment Project

Luis Angel Martinez Campaigns Organizer Fossil Free California

Ronald J. Martin President Fresnans against Fracking

Elise Kalfayan Board Member Glendale Environmental Coalition

Kathy Kerridge Board Member Good Neighbor Steering Committee of Benicia

Amy Moas, Ph.D. Senior Climate Campaigner Greenpeace USA

Jennifer Tanner Director Indivisible CA Green Team

Susan Morgan Founder/Director Indivisible Marin

Mariela Loera Energy & Climate Policy Manager Leadership Counsel for Justice and Accountability

Joseph Smith Owner/Manager Let's Go Farm Dave Shukla Operations Long Beach Alliance for Clean Energy

Joanne Hadley Founder/Coordinator Manhattan Beach Huddle

Michael Stocker Director Ocean Conservation Research

Ilonka Zlatar California Climate Justice Organizer Oil and Gas Action Network

Collin Rees United States Program Manager Oil Change International

Teresa Bui Climate Policy Director Pacific Environment

Judy Irving Executive Director Pelican Media

Martha Dina Argüello Executive Director Physicians for Social Responsibility - LA

Matt Nelson Executive Director Presente.org

Anna Christensen Executive Director Puvunga Wetlands Protectors

Marie Venner Founder & Chair RapidShift Network Chance Cutrano Director of Programs Resource Renewal Institute

Jamie Buell Research Analyst Rise Economy

David Swanson Campaign Coordinator RootsAction

Chris Brown Coordinator Sacramento Climate Coalition

Anne Pernick Senior Advisor SAFE Cities at Stand.earth

Robert M. Gould, MD President San Francisco Bay Physicians for Social Responsibility

Joyce Lane Board President SanDiego350

Pauline Seales Organizer Santa Cruz Climate Action Network

Jeff Hart Co-Founder Save the Environmental Protection Agency

Tanya Borja EJ Policy Associate SCOPE Martha Camacho Rodriguez Director SEE (Social Eco Education)

Jasmine Vazin Deputy Director, Beyond Dirty Fuels Campaign Sierra Club

Maureen Ellenberger Member Society of Fearless Grandmothers

Shoshana Wechsler Co-Coordinator Sunflower Alliance

Eugenia Ermacora Chapter Manager Surfrider Foundation, Los Angeles

Marilyn Price Co-Chair Sustainable Mill Valley

Maura Stephens Coordinating Committee System Change Not Climate Change

Magi Amma Founder and President The Climate Alliance

Woody Hastings Phase Out Polluting Fuels Program Director The Climate Center

Goli Sabha Facilitator Third Act Sacramento

Carla D Grady Admin Transition Sebastopol Mati Waiya Executive Director & Founder Ventura Coastkeeper

Maricruz Ramirez Community Organizer Voices in Solidarity Against Neighborhood Drilling (VISIÓN)

Andrea Leon-Grossmann Deputy Program Director - West Vote Solar

Janice Schroeder Core Member West Berkeley Alliance for Clean Air & Safe Jobs

Mati Waiya Executive Director & Founder Wishtoyo Chumash Foundation

Valerie Ventre-Hutton Legislative Analyst 350 Bay Area Action

Daniel Chandler Steering Committee Member 350 Humboldt

Katie McCammon Program Director 350 Sacramento

Sharon Broberg Steering Committee Member 350 Santa Barbara

Cheryl Weiden Steering Committee member 350 Silicon Valley

Sherry Lear Steering Committee 350 Southland Legislative Alliance cc: OG-SSREIRComments@kerncounty.com AlvidrezK@kerncounty.com planning@kerncounty.com

25 de junio de 2025

Por correo electrónico.

Kern County Board of Supervisors Kern County Administrative Office 1115 Truxtun Avenue, Fifth Floor Bakersfield, CA 93301 Supervisor Phillip Peters (district1@kerncounty.com) Supervisor Chris Parlier (district2@kerncounty.com) Supervisor Jeff Flores (district3@kerncounty.com) Supervisor David Couch (district4@kerncounty.com) Supervisor Leticia Perez (district5@kerncounty.com)

Re: Segundo Informe Suplementario de Impacto Ambiental para las Revisiones a la Ordenanza de Zonificación del Condado de Kern, Título 19 (2025-A), Centrada en los Permisos Locales para la Industria del Petróleo y el Gas (SCH n.º 2013081079)

A la Junta de Supervisores del Condado de Kern:

Nosotros, las organizaciones abajo firmantes, presentamos respetuosamente esta carta en referencia a la propuesta del Condado de Kern de "Revisiones a la Ordenanza de Zonificación del Condado de Kern, Título 19 (2025-A), Centrada en los Permisos Locales para la Industria del Petróleo y el Gas" (Ordenanza). Les escribimos para pedirles rechazar la Ordenanza, que aceleraría la concesión de permisos para decenas de miles de nuevos pozos de petróleo y gas durante las próximas décadas, sin una evaluación ambiental adecuada ni medidas de mitigación, y sin previo aviso ni consulta a los miembros de la comunidad afectada. En lugar de buscar maneras de acelerar la explotación de petróleo y gas y proteger la industria de una revisión ambiental significativa, los líderes del Condado deberían tomar medidas para proteger mejor la salud y la seguridad de las comunidades locales, mejorar el bienestar económico a largo plazo del Condado y promover un futuro más sostenible para los residentes de Kern y de toda California.

La Ordenanza limita el poder de los gobiernos locales para tomar buenas decisiones y la transparencia pública al quere autorizar decenas de miles de nuevos pozos de petróleo y gas, y toda la infraestructura relacionada, basado en solo una única evaluación ambiental generalizada e inadecuada. El Segundo Informe de Impacto Ambiental Suplementario Recirculado (SSREIR) no analiza los impactos a sitios específicos; sin embargo, la Ordenanza y el SSREIR privarían a los residentes de notificaciones o de la oportunidad de comentar cuando se expidan permisos para las operaciones en sus comunidades a futuro.

La explotación y las operaciones de la industria del petróleo y el gas ya perjudican a demasiadas personas en el Condado de Kern, especialmente en las comunidades de bajos ingresos y las comunidades de color. Las investigaciones demuestran que cuando se desarrollan proyectos de petróleo y gas cerca de vecindarios, o cuando se intensifica la densidad de desarrollo, los residentes sufren mayores tasas de efectos adversos para la salud, incluyendo, entre otros, un mayor riesgo de asma, partos prematuros, embarazos de alto riesgo y cáncer.

Aunque los residentes del Condado de Kern ya respiran la peor calidad de aire del país, la Ordenanza y el SSREIR buscan agilizar y facilitar el inicio de nuevas perforaciones, lo que amenaza con aumentar la contaminación atmosférica y agravar los daños existentes para la salud. El SSREIR también reconoce que la Ordenanza causará numerosos otros impactos adversos significativos, como la reducción de los suministros de agua subterránea disponibles, el aumento del ruido molesto, la disminución de las vistas panorámicas, el daño a la vida silvestre, incluyendo especies en peligro de extinción y su hábitat, y la destrucción de valiosas tierras de cultivo.

Los intereses a largo plazo del Condado se verían mejor atendidos mediante la diversificación económica y la inversión en un desarrollo más limpio y sostenible. La industria del petróleo y el gas en California ha disminuido durante muchos años, y existe una creciente epidemia de pozos abandonados que, si la industria se sale con la suya, se convertirán en una carga para el Condado y los contribuyentes, quienes deberán taponarlos y desmantelarlos adecuadamente. En lugar de promover esta costosa industria, el Condado debería explorar maneras de crear empleos para los trabajadores, exigiendo a las empresas que realicen la remediación de los pozos petroleros e invirtiendo en iniciativas para diversificar la economía del Condado.

Acelerar la aprobación de decenas de miles de nuevos pozos de petróleo y gas también sería un desastre para el futuro climático de California. En los últimos años, California ha tenido olas de calor extremas y algunos de los peores incendios registrados en la historia. Estos eventos son alimentados por la producción de combustibles fósiles y los gases de efecto invernadero resultantes que se emiten a la atmósfera. La continua explotación de petróleo y gas solo acelerará y agravará estas emisiones y sus efectos sobre el cambio climático en la salud pública, la economía y nuestro futuro colectivo.

Por todas estas razones, solicitamos a la Junta de Supervisores que rechace la Ordenanza. En cambio, creemos que la Junta debería adoptar medidas para mejorar la protección de la salud y la seguridad de los residentes locales y preparar el camino para una transición liderada por la comunidad y los trabajadores hacia una base económica más segura y sostenible para el Condado.

Agradecemos enormemente su consideración de estos comentarios.

Atentamente,

Kayla Karimi Staff Attorney The Center on Race, Poverty, and the Environment

Colin O'Brien Deputy Managing Attorney Earthjustice, California Regional Office Paulina Torres Staff Attorney Natural Resources Defense Council

Hollin Kretzmann Senior Attorney Center for Biological Diversity Anabel Marquez President Committee for a Better Shafter

Estela Escoto President Committee for a Better Arvin

Diana Mireles President Commité Progreso Lamont

Gloria Herrera President Delano Guardians

Katie Huffling Executive Director Alliance of Nurses for Healthy Environments

Paul Paz y Mino Deputy Director Amazon Watch

Faraz Rizvi Policy and Campaign Manager Asian Pacific Environmental Network (APEN)

Tomas Valadez California Policy Manager Azul

Robert J van de Hoek Environmental Scientist Ballona Wetlands Institute

David F. Gassman co-convenor Bay Area-System Change not Climate Change

Gary Hughes Co-Director / Americas Program Coordinator Biofuelwatch Tianna Shaw-Wakeman Environmental Justice Program Director Black Women for Wellness

Marie Venner Co-Chair Businesses for a Livable Climate

Neel Sannappa Senior Organizer CA Working Families Party

Aditi Varshneya Climate Justice Manager California Environmental Justice Alliance (CEJA) Action

Pa Houa Lee Central Valley Regional Organizer California Environmental Voters

Barbara Sattler Leadership Council California Nurses for Environmental Health and Justice

Stefanie Klass Co-Chair CatholicNetwork US

Sarah Sharpe Deputy Executive Director Central California Asthma Collaborative

Nayamin Martinez Executive Director Central California Environmental Justice Network

Juan Lares Project Director Central Coast Climate Justice Network (C3JN) Lisabeth Ryder Co-Chair CERBAT

Lynda Marin Chapter Lead Citizens' Climate Lobby Santa Cruz Chapter

Haley Ehlers Executive Director Climate First: Replacing Oil & Gas (CFROG)

RL Miller President Climate Hawks Vote

Dee Fromm Managing Director Coastal Lands Action Network

Janelle London Co Executive Director Coltura

Tyler Earl Senior Staff Attorney Communities for a Better Environment

Liza Tucker Consumer Advocate Consumer Watchdog

Sheilah Fish Founder Contra Costa MoveOn

Marcia Hanscom Community Organizer Defend Ballona Wetlands

Jennifer Krill Executive Director Earthworks Martin Bourque Executive Director Ecology Center

Todd Weber Volunteer, Chapter Co-Leader Elders Climate Action NorCal Chapter

Richard Burke Founder, Chapter Leader Elders Climate Action SoCal Chapter

Meghan Sahli-Wells California Director Elected Officials to Protect America

Leah Redwood Action Coordinator Extinction Rebellion San Francisco Bay Area

Nicole Ghio California Director Food & Water Watch

lauren Ornelas Founder/General Programs Team Member Food Empowerment Project

Luis Angel Martinez Campaigns Organizer Fossil Free California

Ronald J. Martin President Fresnans against Fracking

Elise Kalfayan Board Member Glendale Environmental Coalition

Kathy Kerridge Board Member Good Neighbor Steering Committee of Benicia Amy Moas, Ph.D. Senior Climate Campaigner Greenpeace USA

Jennifer Tanner Director Indivisible CA Green Team

Susan Morgan Founder/Director Indivisible Marin

Mariela Loera Energy & Climate Policy Manager Leadership Counsel for Justice and Accountability

Joseph Smith Owner/Manager Let's Go Farm

Dave Shukla Operations Long Beach Alliance for Clean Energy

Joanne Hadley Founder/Coordinator Manhattan Beach Huddle

Michael Stocker Director Ocean Conservation Research

Ilonka Zlatar California Climate Justice Organizer Oil and Gas Action Network

Collin Rees United States Program Manager Oil Change International

Teresa Bui Climate Policy Director Pacific Environment Judy Irving Executive Director Pelican Media

Martha Dina Argüello Executive Director Physicians for Social Responsibility - LA

Matt Nelson Executive Director Presente.org

Anna Christensen Executive Director Puvunga Wetlands Protectors

Marie Venner Founder & Chair RapidShift Network

Chance Cutrano Director of Programs Resource Renewal Institute

Jamie Buell Research Analyst Rise Economy

David Swanson Campaign Coordinator RootsAction

Chris Brown Coordinator Sacramento Climate Coalition

Anne Pernick Senior Advisor SAFE Cities at Stand.earth

Robert M. Gould, MD President San Francisco Bay Physicians for Social Responsibility Joyce Lane Board President SanDiego350

Pauline Seales Organizer Santa Cruz Climate Action Network

Jeff Hart Co-Founder Save the Environmental Protection Agency

Tanya Borja EJ Policy Associate SCOPE

Martha Camacho Rodriguez Director SEE (Social Eco Education)

Jasmine Vazin Deputy Director, Beyond Dirty Fuels Campaign Sierra Club

Maureen Ellenberger Member Society of Fearless Grandmothers

Shoshana Wechsler Co-Coordinator Sunflower Alliance

Eugenia Ermacora Chapter Manager Surfrider Foundation, Los Angeles

Marilyn Price Co-Chair Sustainable Mill Valley

Maura Stephens Coordinating Committee System Change Not Climate Change Magi Amma Founder and President The Climate Alliance

Woody Hastings Phase Out Polluting Fuels Program Director The Climate Center

Goli Sabha Facilitator Third Act Sacramento

Carla D Grady Admin Transition Sebastopol

Mati Waiya Executive Director & Founder Ventura Coastkeeper

Maricruz Ramirez Community Organizer Voices in Solidarity Against Neighborhood Drilling (VISIÓN)

Andrea Leon-Grossmann Deputy Program Director - West Vote Solar

Janice Schroeder Core Member West Berkeley Alliance for Clean Air & Safe Jobs

Mati Waiya Executive Director & Founder Wishtoyo Chumash Foundation

Valerie Ventre-Hutton Legislative Analyst 350 Bay Area Action

Daniel Chandler Steering Committee Member 350 Humboldt Katie McCammon Program Director 350 Sacramento

Sharon Broberg Steering Committee Member 350 Santa Barbara

cc: OG-SSREIRComments@kerncounty.com AlvidrezK@kerncounty.com planning@kerncounty.com Cheryl Weiden Steering Committee member 350 Silicon Valley

Sherry Lear Steering Committee 350 Southland Legislative Alliance