



**BOARD OF SUPERVISORS  
COUNTY OF VENTURA**

GOVERNMENT CENTER, HALL OF ADMINISTRATION  
800 SOUTH VICTORIA AVENUE, VENTURA, CALIFORNIA 93009

From the desk of: **STEVE BENNETT**  
SUPERVISOR, FIRST DISTRICT  
(805) 654-2703  
FAX: (805) 654-2226  
E-mail: [steve.bennett@ventura.org](mailto:steve.bennett@ventura.org)

MEMBERS OF THE BOARD  
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LINDA PARKS  
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JOHN C. ZARAGOZA

August 30, 2018

Gabe Garcia, Field Manager  
Bakersfield Field Office, Bureau of Land Management  
Attn: Bakersfield RMP Hydraulic Fracturing Analysis  
3801 Pegasus Drive  
Bakersfield, CA 93308

Re: Scoping of Environmental Review of Oil & Gas Leasing on Public Lands and  
Federal Mineral Estate

Dear Mr. Garcia:

The Los Padres National Forest is a precious resource to the people of Ventura County and beyond, as well as vital to the natural species that live within it. Many critical habitats and resources could be at risk from oil production and the land clearing and grading associated with it, the risk of spills, fire, and accidents, as well as the associated truck traffic. Environmental analysis should address:

- Risks to watersheds and water resources: The Los Padres National Forest is the headwaters of the entire water supply of the cities of Ojai and Ventura, their surrounding communities, and a large portion of the City of Oxnard's water supply. Risks to water quantity and quality from road and site grading and potential oil, waste fluid, reinjection of waste water and/or produced water, and chemical spills must be addressed. Effects upon watershed processes such as groundwater infiltration and aquifer recharge, surface and groundwater water storage, water temperature, runoff rates, etc. should be analyzed.
- Water Supply: The sources of water for oil and gas production must be identified and the effect of this consumption on the water supply available to people, aquatic species, and agriculture must be quantified and addressed. With Ventura County and Santa Barbara County in a seventh year of severe drought, measures to prevent the use of potable water must be included. The locations and methods for disposal of waste fluids must be identified, including disposal methods that eliminate risk to all potentially potable

water (less than 10,000 ppm TDS). The County of Ventura Initial Study Assessment Guidelines should be used to assess impacts.

- Air quality impacts: Ventura County is a non-attainment area for ozone pollution. Generation of ozone precursors and fine particulates from site development and oil and gas production, as well as from associated motor vehicles must be addressed. The Ventura County Air Pollution Control District should be consulted and their recommendations and adopted impact assessment methodologies followed.
  - Impairment of Recreation and Tourism: The Los Padres National Forest receives millions of visits per year, and these visits are reported to generate over \$24-million in annual spending in surrounding communities. Impacts to recreation and tourism must be addressed, for both existing and future recreational access in the Los Padres. Impacts to recreation include degradation of the visual environment, degradation of air and water, noise, night time light pollution, loss of access, and truck traffic on scenic routes.
  - Native species: The Los Padres National Forest is home to many rare, threatened and endangered species, as well as iconic species such as mountain lion, black bear, and the California condor. The federal government has invested tens of millions of dollars in the recovery of the endangered California Condor which lives and breeds largely in the Los Padres and has a flight range that covers hundreds of miles. Condors are especially vulnerable to small trash objects, powerlines, toxic fluids and other risks associated with oil and gas production in forest areas, including noise, night time light pollution and disruption to wildlife corridors and habitats. The potential impact on the many rare, threatened, and endangered fish and wildlife species in the Los Padres National Forest must be addressed and high value areas avoided.
  - Truck Traffic Impact: The impact of increased truck traffic on rural roads and through rural communities must be addressed. Significant increases in truck traffic can contribute to localized air quality, noise, traffic safety, and community character impacts along rural truck routes. Recreational use of rural roads can also be degraded or imperiled by significant increases in truck traffic. Truck accidents and associated oil or chemical spills can harm water quality. Measures should be included to minimize truck traffic such as requiring use of pipelines for oil, gas, and waste fluids. The County of Ventura Initial Study Assessment Guidelines should be used to assess impacts.
  - Greenhouse Gas Emissions/Global Warming: California greenhouse gas emission impact standards and methodologies should be used to assess impacts and propose mitigation measures to address increases in greenhouse gas emissions, including prohibiting the routine flaring of gas and use of pipelines. The Ventura County Air Pollution Control District should be consulted and their recommendations followed.
  - Fire Hazard: Land clearing, construction, and oil production in the National Forest are potential fire hazards that must be addressed. There have been multiple fires/explosions of oil tanks in Ventura County in the last few years, and sparks from land clearing or construction activity have been identified as fire causes, along with
- Bakersfield Field Office, Bureau of Land Management

malfunction of electrical equipment. Given the high risk to resources and communities from wildland fires, the risks must be thoroughly assessed and avoided or mitigated.

- Hydraulic Fracturing: Issues that should be studied specific to hydraulic fracturing are the need for larger drilling pads and additional land for impounds to store the large amounts of water needed; the increased amount of water needed for fracturing -- estimated at between 1.5 million and 16 million gallons per well, the impacts of any sand mining associated with the operation, surface water degradation from waste fluid disposal, groundwater quality degradation, and the potential impacts of induced seismicity.
- Impact on Neighboring and Overlying Homes and Schools: There are sites identified by the BLM for possible oil and gas leasing and development that are near homes and schools, particularly around the Ojai Valley, or for which mineral estate leasing is proposed. Impacts to homes and schools may include noise, light, and exposure to chemicals or air contaminants and general incompatibility with residential or school uses. Mineral estate leases are proposed for the campus of Thacher School, one of the nation's premier private high schools, and for the Ojai Valley Land Conservancy's Ilvento Preserve. Oil and gas development on or near these sites would be highly incompatible with and disruptive to the existing use of these properties. The County of Ventura's Initial Study Guidelines should be used to assess potential impacts to neighboring or overlying land uses.

Thank you for the opportunity to comment on the proposed scoping of the environmental review of this oil and gas leasing program. Protection of the health and safety of our community is my highest priority, and I appreciate your agency's thorough assessment of these concerns.

Sincerely,



Steve Bennett  
Supervisor, First District