



## City Administration

990 Palm Street, San Luis Obispo, CA 93401-3249  
805.781.7114  
[slocity.org](http://slocity.org)

September 7, 2018

VIA EMAIL & US POST

Bureau of Land Management, U.S. Department of Interior  
Attn: Bakersfield RMP Hydraulic Fracturing Analysis  
3801 Pegasus Drive  
Bakersfield, CA 93308

**RE: Scoping Comments**

To Whom It May Concern:

Thank you for this opportunity to provide the Bureau of Land Management ("BLM") with our comments on the Bureau's Notice of Intent for Potential Amendment to the Resource Management Plan for the Bakersfield Field Office, California, and To Prepare an Associated Supplemental Environmental Impact Statement, published in the *Federal Register* on August 8, 2018. The supplemental EIS will analyze the impacts of hydraulic fracturing ("fracking") on BLM-administered public land and mineral estate in the Bakersfield Field Office Planning Area.

Several parcels identified by the Bureau as "open" for new oil and gas leases are owned and managed by the City of San Luis Obispo. These include parcels that are a part of the City's Reservoir Canyon Natural Reserve that is held strictly for conservation and passive recreation purposes. Also of concern to us is a BLM owned parcel that is contiguous with the City's Irish Hills Natural Reserve for which the City and BLM have entered into a Memorandum of Understanding as of July 26, 2010 (BLM MOU LLCAC06000-1001), that among other provisions includes that BLM shall "Withdraw the parcel from mineral entry..." and "Refrain from issuing discretionary authorizations, such as grazing leases, oil & gas leases, and mineral sales, without first conferring with the City." As a practical matter, these parcels represent legacy chromite mining exploration sites dating back to the World War I era; they do not enjoy vehicular access and underlain entirely by serpentinite-derived soil and rock where oil and gas reserves are highly unlikely. The City of San Luis Obispo respectfully requests that these parcels be removed from further evaluation pursuant to the August 8, 2018 *Federal Register* notice.

In addition, the Bureau has classified several key parcels as "open" to drilling and fracking that are in close proximity to Whale Rock Reservoir, Lake Nacimiento, and Salinas Reservoir that the City relies on for clean drinking water for our local residents. In this regard, it is critical that the supplemental EIS carefully evaluate potential water quality impacts to these waterbodies.

Finally, we would like to point out that the City of San Luis Obispo was not directly notified about this scoping period as an affected property owner. Please provide us with all future public notices regarding this proposal.

Sincerely,

A handwritten signature in blue ink that reads "Robert A. Hill".

Robert A. Hill  
Natural Resources Manager