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Third District Supervisor



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COUNTY OF SANTA BARBARA

September 7, 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

Mr. Gabe Garcia:

I strongly request the Bureau of Land Management (BLM) extend the comment period for the Bakersfield Resource Management Hydraulic Fracturing Analyses to give my constituents and the greater public an opportunity to review and comment on the BLM's proposal for expanding lands open to fracking within the Bakersfield RMP Plan Area, which includes my supervisorial district.

I have received a number of complaints from constituents about the noticing of this scoping process and that the maps initially released lacked the level of detail and clarity required for a substantive comment. Sufficiently granular maps were not released until two weeks of the 30-day comment period had elapsed.

I have grave concerns about the impacts of hydraulic fracturing operations and would ask that the BLM consider the following impacts in their Supplemental EIS:

Hydraulic Fracturing: Issues specific to hydraulic fracturing that should be studied 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.

Risks to watersheds and water resources: The proposed RMP Plan includes a number of sensitive and over-drafted watersheds. 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. The EPA has determined that "activities in the hydraulic fracturing water cycle can – and have impacted -- drinking water resources."¹ With 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).

Air quality impacts: Santa Barbara 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 Santa Barbara County Air Pollution Control District should be consulted and their recommendations and adopted impact assessment methodologies followed.

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Impairment of Recreation and Tourism: The proposed RMP Plan Area includes areas in Santa Barbara County and within my district specifically near tourism destinations including but not limited to vineyards, Los Padres National Forest, State Parks, County Parks, and an overnight guest ranch. Impacts to recreation and tourism must be addressed, as well as for existing and future recreational access in the Los Padres National Forest. 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 proposed RMP Plan Area 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 National Forest 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.

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 Santa Barbara County Air Pollution Control District should be consulted and their recommendations followed.

Fire Hazard: Land clearing, construction, and oil production are potential fire hazards that must be addressed. Sparks from land clearing or construction activity have been identified as fire causes, along with 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.

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. Impacts to homes and schools may include noise, light, and exposure to chemicals or air contaminants and general incompatibility with residential or school 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,



JOAN HARTMANN
Santa Barbara County Third District Supervisor

cc: Jerome E. Perez, *BLM California State Director*

¹ EPA, Office of Research and Development, *Hydraulic Fracturing for Oil and Gas: Impacts from the Hydraulic Fracturing Water Cycle on Drinking Water Resources in the United States*. EPA-600-R-16-236ES, December 2016