



September 6, 2018

Ms. Carly Summers
Supervisory Natural Resources Specialist
Bakersfield Field Office
Bureau of Land Management,
3801 Pegasus Drive,
Bakersfield, CA 93308

RE: Bakersfield RMP Hydraulic Fracturing Analysis / Notice of Intent to prepare a Supplemental EIR (SEIR) and potential amendment to the Bakersfield Field Office Resource Management Plan

Dear Ms. Summers:

The City of Lompoc (City) has recently become aware of the Bureau of Land Management's (above-referenced) Notice of Intent published in the Federal Register on August 8, 2018.

As a part of the scoping process for the proposed SEIR, the City hereby submits, for inclusion in the subject record of proceedings, the following comments and concerns related to potential fracking on land identified in the Notice of Intent.

1. Property Ownership and Notification. The City of Lompoc owns property which appears to have been identified as a part of the potential oil and gas lease property described in the Notice of Intent. Properties owned by the City of Lompoc include Santa Barbara County: APNs 093-040-040; 093-040-020; 093-450-012; 093-450-013; 095-070-008. Please provide the City with copies of preliminary title reports for each of the Assessor Parcel Numbers listed above.

The City was not noticed directly of this proposed action and requests receipt of notice of all future actions and copies of related documents. Notification should be made to: Jim Throop, City Manager, City of Lompoc, 100 Civic Center Plaza, Lompoc, CA 93436; Stacy L. Lawson, Senior Environmental Coordinator City of Lompoc, 100 Civic Center Plaza, Lompoc, CA 93436, and Joseph W. Pannone, City Attorney, Aleshire & Wynder, LLP, 2361 Rosecrans Avenue, Suite 475, El Segundo, CA 90245-4916.

2. The US Bureau of Prison's property (APN: 095-040-11 and 095-040-004) identified as a part of the potential lease area is also located within the City of Lompoc.
3. The Allan Hancock Community College properties (APN: 095-070-005 and 095-070-007) are also located within the City of Lompoc.
4. Environmental Justice and Socioeconomic Impacts. The City is a California Disadvantaged Community (<https://gis.water.ca.gov/app/dacs/>), reflecting lower incomes and higher poverty rates than other California cities. The potential for oil and gas development involving fracking in or adjacent to the City of Lompoc must be evaluated for environmental justice impacts.
5. Water Quality and Quantity. The City of Lompoc relies solely on ground water from a discrete aquifer for its water source. Any potential for contamination of that aquifer could have far reaching impacts on the health and welfare of Lompoc's residents and must be specifically evaluated. The City is informed the potential oil and gas fracking activities may be in the immediate vicinity of the City's well field – its sole source of municipal water supply. As such, the City intends to take an active role in review of any action to allow fracking that may interfere in any manner with the City's water supply. To facilitate the City's understanding of this project, the City respectfully requests your assistance in identifying all relevant documentation and in making it available for review and comment. Those materials need to be uploaded and made accessible via the internet.
 - The closest property identified on the map as being up for potential lease, is only 290-feet from the City's closest water supply well.
 - The City of Lompoc is currently in a state of severe drought and during the past several years has experienced both extreme and exceptional drought. Due to this, any change to the quality or volume of water in the Lompoc Valley could adversely impact both residents and agricultural interests.
6. Seismicity. Properties identified as potentially leasable are located within an existing liquefaction zone along the Santa Ynez River's course. The potential of fracking in those and adjacent areas triggering ground vibration and liquefaction, resulting in damage to structures and critical facilities, including the City's Regional Wastewater Reclamation Plant, must be evaluated.
7. Biological Resources. The areas identified on the map of potentially leasable lands to be evaluated in the SEIR include critical habitat for, and potential presence of, federally threatened and endangered species. Those include the Southern California Steelhead, Red-legged Frog, Southwestern Willow Flycatcher and Least Bell's Vireo, among others. Additionally, California-listed sensitive species have been identified in the areas proposed to be evaluated for lease. Impacts of oil leasing, bentonite clays

and fracking on air and water quality and quantity for those species and their habitats must be analyzed.

While the Federal Register Notice states "Preliminary issues for the SEIS have been identified by BLM personnel; Federal, State and local agencies; and other stakeholders.", the City of Lompoc is not aware of any direct communication or solicitation of comments from our agency on this proposal. Neither are we aware of any solicitation of comments from other property owners within our City (US Bureau of Prisons and Allan Hancock College), or the adjoining landowner Vandenberg Air Force Base. On September 4, 2018, when the City first became aware of this proposal, City staff attempted to contact you via phone and left a message. To date the call has not been returned.

The City is requesting a 30-day extension to the comment period, allowing time for adequate review of background documents and consideration of the potential impacts of hydraulic fracking on the Lompoc Valley. We expect and appreciate the attention you will give to our community's concerns.

Sincerely,



Jim Throop, City Manager
City of Lompoc

- c. Honorable Senator Feinstein
- Honorable Senator Harris
- Honorable Congressperson Carbajal
- Honorable 4th District Santa Barbara County Supervisor Peter Adam
- Honorable 3rd District Santa Barbara County Supervisor Joan Hartmann
- Honorable Lompoc Mayor and Council Members
- Joseph W. Pannone, City Attorney
- Teresa Gallavan, Economic Development Director / Assistant City Manager
- Tikan Singh, Acting Utility Director
- Susan Zavolta, Senior Administrative Analyst
- Robert Archer, Acting Wastewater Superintendent
- Brian Halvorson, Planning Manager
- Kevin McCune, Public Works Director
- Michael Luther, City Engineer
- Richard Fernbaugh, Aviation and Transportation Administrator
- Dirk Ishiwata, Facilities, Fleet and Parks Maintenance Manager
- Daniel Lara, Park Maintenance Supervisor
- [Blm ca bkfo oil gas update@blm.gov](mailto:Blm_ca_bkfo_oil_gas_update@blm.gov)