

**350 CONEJO / SAN FERNANDO VALLEY • 350 EUGENE • 350 VENTURA COUNTY CLIMATE HUB • A2 (ANTHROPOCENE ALLIANCE) • BATTLE CREEK ALLIANCE & DEFIANCE CANYON RAPTOR RESCUE • CALWILD • CALIFORNIA LAND WATCH • CARRIZO PLAIN CONSERVANCY • CENTRAL VALLEY PARTNERSHIP • CHANNEL ISLANDS RESTORATION • CLIMATE FIRST: REPLACING OIL & GAS (CFROG) • CLIMATE HAWKS VOTE • COASTAL FUND - UCSB • COASTAL RANCHES CONSERVANCY • COMMITTEES FOR LAND, AIR, WATER AND SPECIES (CLAWS) • COMMUNITY ENVIRONMENTAL COUNCIL • CONSERVATION LANDS FOUNDATION • EARTH ETHICS, INC. • ECOLOGISTICS, INC. • ENDANGERED HABITATS LEAGUE • ENVIRONMENT IN THE PUBLIC INTEREST • ENVIRONMENTAL DEFENSE CENTER • ENVIRONMENTAL PROTECTION INFORMATION CENTER (EPIC) • FRAZIER PARK MOUNTAIN NEIGHBORS • FRAZIER PARK MOUNTAIN PROGRESSIVES • FRIENDS OF ARROYO BURRO • FRIENDS OF THE SANTA CLARA RIVER • GET OIL OUT! • GREEN COVE DEFENSE COMMITTEE • JOHN MUIR PROJECT • LAST TREE LAWS, L.L.C. • LATINO OUTDOORS • LOS PADRES FORESTWATCH • RESTORE: THE NORTH WOODS • SAN LUIS OBISPO SURFRIDER CHAPTER • SANTA BARBARA AUDUBON SOCIETY • SANTA BARBARA CHANNELKEEPER • SANTA BARBARA COUNTY ACTION NETWORK • SANTA BARBARA FOUNDATION • SANTA BARBARA MUSEUM OF NATURAL HISTORY • SEQUOIA FORESTKEEPER • SIERRA CLUB • SOAR SAVE OPEN SPACE AND AGRICULTURAL RESOURCES • SURFRIDER FOUNDATION, SAN LUIS OBISPO • THE VENTURA AUDUBON SOCIETY • THE WILDERNESS SOCIETY • UCSB ENVIRONMENTAL AFFAIRS BOARD • UMPQUA WATERSHEDS • VENTURA COUNTY CLIMATE ALLIANCE • VENTURA LAND TRUST • WESTERN WATERSHEDS PROJECT • WILD NATURE INSTITUTE**

March 13, 2026

Bureau of Land Management  
Bakersfield Field Office  
Attn: Sarah Mathews, Project Manager  
3801 Pegasus Drive  
Bakersfield, CA 93308

Submitted via BLM National NEPA Register

**Re: Comments on the Draft Supplemental Environmental Impact Statement for Oil and Gas Leasing and Development (December 10, 2025)**

Dear Ms. Mathews,

The undersigned organizations submit the following comments on the Bureau of Land Management's Draft Supplemental Environmental Impact Statement (Draft SEIS) for oil and gas leasing and development within the Bakersfield Field Office planning area, dated December 10, 2025.

This Draft SEIS advances a federal oil and gas leasing framework affecting hundreds of thousands of acres across Central California, including extensive federal mineral estate underlying lands valued for clean water, wildlife habitat, outdoor recreation, and community health. The proposal has a long and contested history, and this supplemental review is being prepared pursuant to court-approved settlement agreements requiring BLM to address prior deficiencies before resuming leasing.

While we appreciate the opportunity to comment, we remain concerned that the Draft SEIS largely preserves earlier decisions without meaningfully addressing the issues raised during scoping or accounting for significant changes in state and local law, land use, and community expectations since the original analysis was developed.

For the reasons outlined below, we believe the Draft SEIS is inadequate as written and must be substantially improved before it can be finalized.

**Key concerns**

**1. The Draft SEIS does not meaningfully evaluate alternatives that would reduce impacts or avoid sensitive areas.**

Despite more than a decade of litigation, public input, and evolving conditions, the Draft SEIS does not analyze new alternatives that would reduce the footprint of oil and gas leasing or

remove high-conflict areas from consideration. A supplemental review should be used to reassess where leasing is appropriate today, not simply reaffirm past assumptions.

## **2. The Draft SEIS fails to address conflicts with California public health protections and local authority.**

Since the original planning decisions were made, California has adopted major new protections, including SB 1137, which establishes Health Protection Zones to limit oil and gas drilling near homes, schools, and other sensitive receptors. The Draft SEIS confirms that the proposal now overlaps 39,901 acres of verified Health Protection Zones, including areas adjacent to schools and communities in New Cuyama, the City of Oxnard, and Lompoc. California has also adopted AB 3233, which bans new hydraulic fracturing permits statewide and strengthens local governments' authority to regulate or prohibit oil and gas development. While the Draft SEIS acknowledges these changes, it does not meaningfully analyze how federal leasing decisions conflict with these protections or what those conflicts mean in practice for communities and public health.

## **3. Community health and safety concerns remain inadequately addressed.**

The planning area includes schools, neighborhoods, and heavily used public spaces. While the Draft SEIS generally acknowledges potential health-related impacts, it relies heavily on broad assumptions and future, site-specific review, and does not clearly explain how risks from air pollution, industrial traffic, noise, lighting, or spills would be avoided at the leasing stage, particularly in areas near communities and sensitive receptors.

## **4. Risks to water resources are not fully accounted for.**

Oil and gas leasing overlaps with watersheds and groundwater resources that supply drinking water and support agriculture and ecosystems. The Draft SEIS does not adequately address how soils disturbance, spills, produced water handling, erosion and sedimentation, or long-term contamination could affect these water resources, and instead relies on general mitigation assumptions and future site-specific review. This approach fails to account for cumulative risks in a region already facing chronic drought and increasing climate-driven stress on limited water supplies and strained, sensitive ecosystems.

## **5. Wildlife habitat, public lands, and special designations remain vulnerable.**

As emphasized during scoping, the planning area includes lands with special status or public significance, including proposed wilderness areas, Areas of Critical Environmental Concern, state parks, and widely used recreation landscapes. These places were identified for their ecological, cultural, scenic, or recreational value, yet the Draft SEIS does not demonstrate how leasing decisions would avoid undermining the purposes of these designations or fragmenting wildlife habitat and movement corridors.

## **6. Cumulative impacts remain abstract due to deferred analysis.**

Although the Draft SEIS includes a discussion of cumulative impacts, the analysis remains largely abstract because key details are deferred to future, site-specific review. By postponing analysis of where wells, roads, pipelines, and other infrastructure would actually occur, the Draft SEIS fails to take a hard look at how impacts would accumulate across watersheds, wildlife habitat, recreation areas, communities, and the climate.

## **Conclusion**

This Draft SEIS represents another step in a process that has stretched on for more than a decade without resolving fundamental concerns. Given the scale of the proposal, the history of legal challenges, and the significant changes in California law and local land-use priorities, BLM should not move forward without meaningful revisions that reduce conflicts and protect communities, water resources, wildlife, and valued public lands.

We urge BLM to revise the Draft SEIS, which remains inadequate and incomplete, and to ensure the Final SEIS evaluates reasonable alternatives that limit leasing in high-conflict areas, respect state and local protections, and reflect current public health, environmental, and conservation priorities.

Thank you for the opportunity to comment.

Sincerely,

Alan Weiner  
Chapter Lead  
350 Conejo / San Fernando Valley

Patricia Hine  
President  
350 Eugene

Jan Dietrick  
Policy Lead  
350 Ventura County Climate Hub

Arif Ullah  
Executive Director  
A2 (Anthropocene Alliance)

Marily Woodhouse  
Director  
Battle Creek Alliance & Defiance Canyon  
Raptor Rescue

Andrew Christie  
President  
California Land Watch

Linda Castro  
Assistant Policy Director  
CalWild

Neil Havlik  
President  
Carrizo Plain Conservancy

Dr. Daniel O'Connell  
Executive Director  
Central Valley Partnership

Ken Owen  
Executive Director  
Channel Islands Restoration

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

RL Miller  
President  
Climate Hawks Vote

Avery Morgan  
Chair  
Coastal Fund - UCSB

Candice Meneghin  
Executive Director  
Coastal Ranches Conservancy

Nancy Black  
Board President  
Committees for Land, Air, Water and Species  
(CLAWS)

Sigrid Wright  
CEO/Executive Director  
Community Environmental Council

Kara Matsumoto  
Public Lands Policy Director  
Conservation Lands Foundation

Mary Gutierrez  
Director  
Earth Ethics, Inc.

Stacey Hunt  
CEO  
Ecologistics, Inc.

Dan Silver  
Executive Director  
Endangered Habitats League

Gordon Hensley  
San Luis Obispo Coastkeeper  
Environment in the Public Interest

Maggie Hall  
Deputy Chief Counsel  
Environmental Defense Center

Matthew Simmons  
Climate Attorney  
Environmental Protection Information  
Center (EPIC)

Mary Brooks  
Manager  
Frazier Park Mountain Neighbors

Mary Brooks  
Manager  
Frazier Park Mountain Progressives

Daniel  
McCarter  
Friends of Arroyo Burro

James Danza  
Chair  
Friends of the Santa Clara River

Esther Kronenberg  
Co-chair  
Green Cove Defense Committee

Jennifer Mamola  
Policy and Advocacy Director  
John Muir Project

Kirstin Beatty  
Founder  
Last Tree Laws, L.L.C.

Jazzari  
Policy Advocate  
Latino Outdoors

Benjamin Pitterle  
Director of Advocacy  
Los Padres ForestWatch

Michael Kellett  
Executive Director  
RESTORE: The North Woods

Charles Varni  
Chair  
San Luis Obispo Surfrider Chapter

Katherine Emery  
Executive Director  
Santa Barbara Audubon Society

Ted Morton  
Executive Director  
Santa Barbara Channelkeeper

Ken Hough and Jeanne Sparks  
Co-Executive Directors  
Santa Barbara County Action Network

Jackie Carrera  
President & CEO  
Santa Barbara Foundation

Luke J. Swetland  
President & CEO  
Santa Barbara Museum of Natural History

Maya Khosla  
Treasurer  
Sequoia ForestKeeper

Jackie Feinberg  
National Lands Conservation Campaign  
Manager  
Sierra Club

Linda Parks  
Executive Director  
SOAR Save Open Space and Agricultural  
Resources

Jacob McNevin  
Climate & Clean Energy Program  
Coordinator  
Surfrider Foundation, San Luis Obispo

Vincent Kinsch  
Conservation Committee Chair  
The Ventura Audubon Society

Helen O'Shea  
California State Director  
The Wilderness Society

Anna Eisenberg  
Executive Chair  
UCSB Environmental Affairs Board

Janice Reid  
Conservation Chair  
Umpqua Watersheds

Melissa Baffa  
Executive Director  
Ventura Land Trust

Laura Cunningham  
California Director  
Western Watersheds Project

Dr. Monica Bond  
Principal Scientist  
Wild Nature Institute