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EIGHTEENTH SENATORIAL DISTRICT



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April 19, 2002

Jeanine Derby, Forest Supervisor
Los Padres National Forest
6755 Hollister Avenue, Suite 150
Goleta, CA 943117

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Dear Ms. Derby:

I want to begin my comments on the Draft Environmental Impact Statement (DEIS) for Oil and Gas leasing in the Los Padres National Forest (LPNF) by expressing my opposition to opening up *any* of the LPNF for leasing, especially given the small amount of oil that may be recoverable and the lack of definitive information on the impacts of developing those leases.

As you may know, I have represented Santa Barbara County in the State Legislature for almost twenty years and have, therefore, been involved in all aspects of oil and gas leasing and development. In fact, in 1994, I authored the California Coastal Sanctuary Act which prohibits any new oil and gas leasing in State waters. My reasons for carrying this legislation are very similar to the reasons I am opposed to leasing in the LPNF—*leasing inevitably leads to oil and gas development*. The statement in the DEIS that “The decisions made as a result of this analysis will not result directly in ground disturbing activities,” provides a false sense of security. All one has to do is look at the current situation with the 36 oil and gas leases in the Outer Continental Shelf (OCS) off the Central Coast. Even though oil companies have not exercised adequate due diligence in their development, the right to develop these leases, the bulk of which are over 20 years old, is taken for granted. Creating this appalling situation in the LPNF, which is a primary, scenic recreation area and wildlife habitat on the Central Coast, simply does not make good environmental or economic sense.

Rather than providing definitive information on the potential impacts that are likely to occur if leasing goes forward, the DEIS provides only the basics. In addition, comments submitted by the County of Santa Barbara and the California Coastal Commission indicate that much of this information is significantly out of date. Even so, it is my belief that the potential impacts of leasing in the LPNF, especially in areas such as Figueroa Mountain, would far exceed the minimal benefits of exploiting this resource. The DEIS indicates that the potential recoverable oil from the High-Potential Areas ranges from 0 to 936 million barrels. I would submit that this is a significant range, but even the most optimistic scenario would result in a paltry amount of oil. In comparison, onshore oil wells within the County of Santa Barbara have produced over 23 billion barrels of oil to date.

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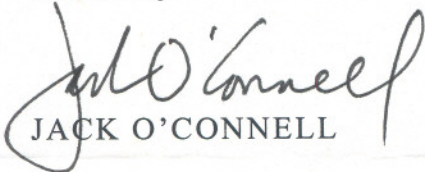
One of my greatest concerns is the fact that the LPNF is home to at least 23 species, including the California Condor, that are classified as endangered, threatened or proposed for listing under the Endangered Species Act. It is also a critical area for Valley and Blue Oak woodlands which are experiencing a severe lack of regeneration. The survival of these species may be dependent upon keeping the LPNF in its relatively undisturbed condition, which would be difficult were it to be leased and developed.

Finally, the LPNF is widely used as a scenic and recreational resource. An indicator of this extensive usage is the widespread and longstanding controversy over the National Forest's Adventure Pass program. Oil and gas leasing, and the industrial traffic associated with the development of these leases is in direct conflict with this recreational usage. The DEIS must be revised to reflect the nature and significance of these conflicts.

In conclusion, making leasing decisions based on a document with outdated information, as well as insufficient detail, and that will have significant, long lasting repercussions on the LPNF, would be a travesty. This DEIS must, therefore, be significantly revised before it can be used to make decisions which will set in motion a process leading to oil and gas development in the LPNF.

Thank you for your consideration of my comments.

Sincerely,



JACK O'CONNELL

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