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SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING



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February 15, 2002

Al Hess, Project Manager
USDA Forest Service
1190 East Ojai Ave.
Ojai, CA 93023

RE: Comments on the DEIS for LPNF Oil & Gas Leasing

Dear Mr. Hess:

The County of San Luis Obispo Department of Planning & Building has reviewed the Draft EIS for the above mentioned project. We offer the following comments:

We understand the methodology by which the USFS identified a Reasonable Foreseeable Development Scenario (RFD), however we are concerned that conclusions drawn from analysis based on the RFD may be inappropriately applied to other areas of LPNF. For example, estimates of areas of disturbance were calculated based on well pad, road and pipeline development potential. Using these numbers under the different alternative scenarios, further analysis in individual issue areas was performed. However, if oil and gas development were to occur outside the identified HOGPAs, these estimates could be grossly inaccurate and the analysis in the DEIS is inadequate. While we concur with the methodology and analysis performed for the identified HOGPAs, we do not support conclusions that would be applied to the other areas of LPNF. Leasing decisions outside the identified HOGPAs should undergo additional environmental analysis at the time it is considered.

We have noted that there appears to be discrepancies in the tables discussing the various alternatives. For example, in Table 2-4 the area of "No Surface Occupancy" (NSO) identified under Alternative 3 for the Lopez Canyon HOGPA is listed at 2,205 acres. Table 2-9 lists the area of NSO identified under Alternative 5 for the Lopez Canyon HOGPA at 2,187 acres, 18 acres less than Alternative 3. However, the description of Alternative 5 indicates that for HOGPAs, Alternative 3 terms plus Alternative 4 biological lease terms is used, thus the NSO should not be less than for Alternative 3. In fact it should be more restrictive depending if Alternative 4 biological lease terms would increase NSO areas. Revised calculations should be provided if the tables in the document are inaccurate.

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The County concurs with the conclusion on pg. 4-152 that increased oil and gas development would include a potential adverse impact in regards to increase fire hazard that cannot be avoided. This is of special concern for Lopez Canyon HOGPA due to its drainage towards Lopez Lake, a major county municipal water source. Due to its remote location and rugged terrain, a fire resulting from an oil and gas operation, given certain meteorological conditions, would have a good chance to become a difficult wildland fire that could have significant effects on Lopez Lake drainage due to erosion and water quality.

Overall, it is the position of the County that Alternative 5 or 5a is preferable if limited to the HOGPAs identified in the document. Leasing decisions in any area outside the identified HOGPAs should be examined in a supplemental document.

Sincerely,

A handwritten signature in black ink, appearing to read "S. McMASTERS", with a large, stylized flourish at the end.

STEVEN McMASTERS
Environmental Specialist