

February 20, 2002

USDA Forest Service
Attn: Al Hess, Project Manager
1190 East Ojai Avenue
Ojai, CA 93023

Subject: DEIS for Los Padres National Forest Oil and Gas
Leasing Program

Dear Mr. Hess,

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the Draft Environmental Impact Statement.

Your proposed responses to these comments should be sent directly to the commentator, with a copy to Julie Ward, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA., 93009.

If you have any questions regarding any of the comments, please call the appropriate respondent. Overall questions may be directed to Julie Ward at (805) 654-3588.

Sincerely,

Christopher Stephens, Director
Ventura County Planning Division

Attachments

County RMA Reference Number 02-006



0035

county of ventura

February 20, 2002

USDA Forest Service
Attention: Al Hess, Project Manager
1190 East Ojai Avenue
Ojai, CA 93023

Subject: Los Padres National Forest Oil & Gas Leasing Program
Draft Environmental Impact Statement (RMA Ref. #: 02-006)

Dear Mr. Hess:

Thank you for the opportunity to comment on the referenced document, an analysis of seven alternative ways to manage oil and gas leasing on legally available lands within the Forest.

Copies of the DEIS were also given to the Ventura County's Public Works Agency, Air Pollution Control District, and Environmental Health Division. Their comments to the document are forwarded in separate attachments to the Planning Director's cover letter.

I am pleased that the DEIS noted that the decisions resulting from this analysis and DEIS will not directly result in any on-the-ground activities, and any exploration, drilling or field development will require site-specific environmental analysis and separate decisions, involving public input. This acknowledgement is significant to our Agency since the areas with the highest potential for oil and gas discoveries are in Ventura County.

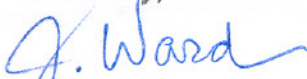
I am also pleased that the DEIS notes that there are private lands within the Los Padres National Forest that may retain the mineral rights, and even some of the federal lands have private mineral rights. As the DEIS states on page 1-13, "development of minerals on or beneath these lands is conducted under the oversight of state and local jurisdictions." The County of Ventura would have land use jurisdiction for any oil and gas related projects on privately owned parcels. Each proposal for exploration, drilling, or development would be assessed under the California Environmental Quality Act regulations and the County's General Plan and Zoning Code Ordinance. Currently, we have active Conditional Use Permits for oil operations on privately owned land within the Forest. In addition, Ventura County Zoning Ordinance Section 8107-5.2 (copy attached) states that the provisions of Section 8107-5 (Oil and Gas Exploration and Production) "shall



apply to any oil and gas exploration and development on Federally owned lands for which no land use permit is required by Ventura County." (No permit is required by the County of Ventura for oil and gas exploration and production operations conducted on Federally owned lands pursuant to the provisions of the Mineral Lands Leasing Act of 1920). The provisions of Section 8107-5 would be imposed in the form of permit "conditions", attached to a Ventura County Zoning Clearance that the County Planning Director would issue for such activity.

Again, thank you for the opportunity to review the DEIS. We will follow the progress of the document and whatever actions ensue, and will appreciate being kept informed of the leasing program as it moves through the review process.

Sincerely,



Julie Ward
Oil and Gas Projects Planner

- c. The area used for worm beds, feedstock, bedding material, castings, and related materials shall not, in the aggregate, exceed 5,000 square feet and shall not exceed six feet in height. If a discretionary permit is issued pursuant to Sec. 8105-4, these standards may be exceeded.
- d. The volume of raw or composted feedstock and the bedding materials shall not exceed that which is reasonably necessary to the production of the worms raised on the site.
- e. Prior to the issuance of a Zoning Clearance of the use, a "stockpile management plan" shall have been approved by the Environmental Health Division. The operations shall only be conducted in conformance with the approved plan and the limitations set forth in this section.

(REP./REEN. ORD. 4092 - 6/27/95)

Sec. 8107-3 - AUTO, BOAT, AND TRAILER SALES LOTS - New and used automobile, trailer and boat sales yards are subject to the following conditions:

Sec. 8107-3.1 - No repair or reconditioning of automobiles, trailers or boats shall be permitted unless such work is accessory to the principal retail use and is done entirely within an enclosed building;

Sec. 8107-3.2 - Except for required landscaping, the entire open area of the premises shall be surfaced with concrete or asphaltic concrete.

Sec. 8107-4 - MOBILEHOME PARKS

Sec. 8107-4.1 - Mobilehome parks shall be developed in accordance with all applicable standards, including density standards (number of dwellings per unit of lot area), of the zone in which the mobilehome park is located.

Sec. 8107-4.2 - A mobilehome park may include, as part of an approved permit, recreational and clubhouse facilities and other accessory uses.

Sec. 8107-4.3 - The minimum distance between structures in a mobilehome park shall be ten feet, except that the minimum distance between accessory structures shall be six feet.

Sec. 8107-5 - OIL AND GAS EXPLORATION AND PRODUCTION

Sec. 8107-5.1 - Purpose - The purpose of this section is to establish reasonable and uniform limitations, safeguards and controls for oil and gas exploration and production facilities and operations within the County which will allow for the reasonable use of an important County resource. These regulations shall also ensure that development activities will be conducted in harmony with other uses of land within the County and that the rights of surface and mineral owners are balanced.

Sec. 8107-5.2 - Application - Unless otherwise indicated herein, the purposes and provisions of Section 8107-5 et seq. shall be and are hereby automatically imposed on and made a part of any permit for oil or gas exploration and development issued by Ventura County on or after March 24, 1983. Such provisions shall be imposed in the form of permit conditions when permits are issued for new development or for existing wells/facilities without permits, or when existing permits are modified. These conditions may be modified at the discretion of the Planning Director, pursuant to Sec. 8111-5.2 (Incorrect reference; see Sec. 8111-4.2). Furthermore, said provisions shall apply to any oil and gas exploration and development operation initiated on or after March 24, 1983, upon Federally owned lands for which no land use permit is required by Ventura County. No permit is required by the County of Ventura for oil and gas exploration and production operations conducted on Federally owned lands pursuant to the provisions of the Mineral Lands Leasing Act of 1920 (30 U.S.C. Section 181 et seq.). (AM.ORD.3810-5/5/87)

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
WATER RESOURCES & ENGINEERING DEPARTMENT

MEMORANDUM

February 11, 2002

TO: Joseph Eisenhut, RMA - Planning Division

FROM: Lowell Preston, Manager, Water Resources Division

SUBJECT: **LAS PADRES NATIONAL FOREST OIL AND GAS LEASING
PROGRAM DRAFT ENVIROMENTAL IMPACT STATEMENT.
RMA REF. #01-090: 02-006**

Project Description: The purpose of the Draft Environmental Impact Statement (DEIS) is to disclose the environmental effects of alternative leasing scenarios (7) the US. Forest Service is considering for managing oil and gas resources on the Los Padres National Forest (LPNF). Our review of the document only applies to the boundaries of the LPNF located in Ventura County. We do not have any specific comments.

Review:

The DEIS Chapter 4 – Environmental Consequences Section 4.3.3.2. Water Resources identifies potential impacts to Groundwater Quality from transfer of drilling fluids and saline production water to fresh water aquifers if oil wells are not properly constructed.

Specific mitigation measures to control drilling fluids and saline water are required.

The introduction of pollutants from spills and releases via exposed ground surfaces to subsurface aquifers.

Measures to insure that spills are not experienced at all transfer and storage locations are required and adoption of spill recovery plans for all other areas are necessary.

The water consumption for road watering and drilling fluids during the early development of a field could have a short term adverse effect on local groundwater levels and secondary adverse effects on seeps and springs.

The use of groundwater for dust control and drilling fluids is not considered significant, however, water consumption for well production may be significant and if this use is anticipated it should be reviewed by the EIR.

Best Management Practices (BMPs) (Appendix E) for protection of water quality help mitigate potential impacts. However, specific conditions are required for those items mentioned above.

February 7, 2002

Ms. Jeanine Derby
Forest Supervisor
Los Padres National Forest
6755 Hollister Avenue, Suite 150
Goleta, California 93117

Deputy Directors of Public Works

Wm. Butch Britt
Transportation

John C. Crowley
Water Resources & Engineering

Lane B. Holt
Central Services

Kay Martin
Solid Waste Management

Jeff Pratt
Flood Control

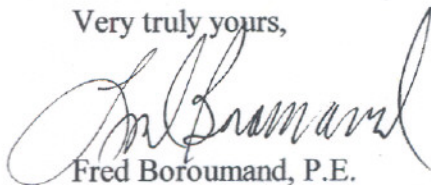
SUBJECT: Draft Environmental Impact Statement (DEIS)
Los Padres National Forest Oil and Gas Leasing Program

Dear Ms. Derby :

The Ventura County Flood Control District (District) has reviewed the submittal with respect to issues under District purview. The DEIS adequately address the issues of surface water quality and quantity and the District has no comments at this time. The Los Padres National Forest is located in flood zone 'D', an area of unknown flood hazards. There are also several District jurisdictional watercourses in the National Forest. The lessees should be informed that any construction, drilling or mining activities are subject to District permitting and review.

If you have questions concerning this review, please call the undersigned at (805) 654-2011.

Very truly yours,



Fred Boroumand, P.E.
Manager, Permit Section,
Planning and Regulatory Division
Flood Control Department

FB/tt

c: J. Eisenhut, County of Ventura, RMA Planning

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**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic and Planning & Administration**

MEMORANDUM

January 30, 2002

TO: Resource Management Agency, Planning Division
Attention: Joseph Eisenhut

FROM: Nazir Lalani, Principal Engineer *NL*

SUBJECT: Review of Document 02-006
Draft Environmental Impact Statement
For the oil and gas leasing program within Los Padres National Forest
Project area includes much of the forest within Montgomery, San Luis Obispo, Santa Barbara, Ventura and Kern Counties
Applicant: USDA / Forest Service
Forest Supervisor
Los Padres National Forest
6755 Hollister Avenue, Suite 150
Goleta, CA 93117
Lead Agency: USDA / Forest Service

The Transportation Department has reviewed the Draft Environmental Impact Statement for the above project. The proposed project is for oil and gas leasing program within Los Padres National Forest including much of the forest within Montgomery, San Luis Obispo, Santa Barbara, Ventura and Kern Counties. We offer the following comments:

- 1) The Draft Environmental Impact Statement indicated that this project would generate additional traffic.
- 2) Page 4-102 discusses the unresolved problems on Ventura County roads regarding the use of heavy trucks on county roads. The DEIR should discuss in detail the mitigation measures of these impacts and how they will be implemented.
- 3) A traffic study is required to address the following issues:
 - Trip generation/distribution on Ventura County Road Network
 - Safety issues relating to truck operations on Highway 33
 - Exact routing of trips and hours of trucking
 - Level Service impact of Highway 33 north of Casitas Springs area
 - The need for improving and maintaining Lockwood Valley Road.
- 4) The cumulative impact of this project when considered with the cumulative impact of all other approved (or anticipated) development projects in the County is potentially significant. To address the cumulative impacts of this project on the Regional Road Network, the project proponent must submit a traffic analysis in sufficient detail that shows the increases in average

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daily traffic (ADT) on the County's Regional Road Network attributable to this project. The Transportation Department can then calculate the Traffic Impact Mitigation Fee (TIMF) amount (if any) due the County.

As an alternative to the above traffic analysis, we could accept the TIMF, which is based on the current County Traffic Impact Mitigation Fee Ordinance (#4246) and the amount of traffic generated by the project. The TIMF owed to the County would be \$ 45.61/ADT generated by the project.

- 5) Our review is limited to the impacts this project may have on the County's Regional Road Network.

Please call me at 654-2080 if you have questions.

c: Jim Myers
Ron Sheppard

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J. Eisenhut\Los Padres National Forest Oil & Gas Leasing Program
January 11, 2002
Page 2

b. *During well drilling and testing phases, all unpaved areas, including roadways, should be periodically watered, treated with environmentally safe dust suppressants, or paved to prevent excessive amounts of dust.*

5) Section 4.3.2.3.2, Mitigation for All Project Phases, page 4-11

a. Mitigation measure No. 4 should be revised as follows:

All unpaved areas with vehicle traffic, including roadways, should be periodically watered, treated with environmentally safe dust suppressants, or paved to prevent excessive amounts of dust.

b. On-site vehicle speeds should not exceed 15 miles per hour.

If you have any questions, contact me by telephone at (805) 645-1427 or by email at chuck@vcapcd.org.

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY
PLANNING DIVISION
MEMORANDUM

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DATE: Jan 9, 2002
TO: Distribution List as Checked Below
FROM: Joseph Eisenhut, L#1740, Phone - 654-2464, FAX - 654-2509
SUBJECT: Non-County ("Outside") Environmental Document Review Notice

RMA Reference #: 02- 006 Document Type: DEIS
Project: Los Padres National Forest Oil & Gas Leasing Program
Lead Agency: U.S.D.A. / Forest Service
Lead Agency Contact: AL HESS Phone #: 646-4348x311

Your written comments **must** be received by Noon FEB 14, 2002. Therefore, please make allowances for brown mail travel time. You can also telafax your comments to me at 654-2509.

At the direction of the Board of Supervisors, any County of Ventura agency/department comments regarding "outside" (non-County) environmental documents shall be coordinated through the County Planning Director. If you wish to comment on the subject project, please do so in a letter or memo suitable for publication. **On your response, please indicate the RMA reference number for this project.** If your agency/department does not wish to comment on the subject project, then please indicate so below* and return this memo to me before the deadline date indicated above.

A limited number of full copies (See below) were received by the RMA. Therefore, you may review the full document at the RMA offices (please call me first) or you may request a full copy directly from the lead agency's contact person indicated above.

*No comment; sign Melinda Talent date 2-1-02 phone 654-2811

Distribution

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| K <input checked="" type="checkbox"/> | 1600 | PWA/Water Resources, L. Preston | X <input type="checkbox"/> | _____ | _____ |
| L <input checked="" type="checkbox"/> | 1620 | PWA/Transportation, W. Britt | Y <input type="checkbox"/> | _____ | _____ |

Attachment

d. 1/9/02 b. DLS