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July 23, 2025

Bureau of Land Management

Attn: Sarah Mathews, Project Manager

Bakersfield Field Office Central Coast Field Office

35126 McMurtrey Ave 940 2nd Ave

Bakersfield, CA 93308 Marina, CA 93933

Submitted via eplanning

Re: Intent To Prepare Oil and Gas Supplemental Environmental Impact Statement and Potential Resource Management Plan Amendment: Bakersfield [DOI-BLM-CA-C060-2025-0053-RMP-EIS] and Central Coast [DOI-BLM-CA-C090-2025-0017-RMP-EIS]

As environmental, public health and community groups with hundreds of thousands of members in California, we are alarmed that the Bureau of Land Management (BLM) is proposing to open more than a million acres of public lands and mineral estate in California to oil and gas drilling and hydraulic fracturing (fracking). We are opposed to this action—it risks dire impacts to communities, the climate, wildlife, and more. Should BLM allow any new fossil fuel development, however, it must adhere to California laws and policies which, among other things, prohibit fracking and require a 3,200-foot setback from new wells.

New oil and gas operations are incompatible with the urgent actions necessary to address the climate crisis. Scientists are warning that the planet's fossil fuel "budget" has been overspent. There is enough oil, gas, and coal in already open, producing fields globally to take us far beyond livable climate targets. Moreover, the evidence is clear that fossil fuels (at all lifecycle stages) are driving a multitude of interlinked crises that jeopardize the breadth and stability of life on Earth. At a time when California has faced—and is facing—devastating climate change-fueled fires, and when Texas has lost over 100 lives in a rare (yet increasingly common) 100-year flood, it defies reason and basic common sense for the federal government to continue allowing fossil fuel development, let alone inviting much more of it. Now more than ever, we must keep fossil fuels in the ground.

BLM must also consider that new drilling and fracking would further damage air quality in California, particularly in the San Joaquin Valley, which spans both the Bakersfield and Central Coast Field Office planning areas. The San Joaquin Valley is home to one of the most polluted air basins in the United States, failing to meet federal pollution

¹ See, e.g., Shaye Wolf, Ph.D, et al., Scientists' warning on fossil fuels, *Oxford Open Climate Change*, Vol. 5, Issue 1 (March 2025), https://academic.oup.com/oocc/article/5/1/kgaf011/8099165?login=false.
² Id.

standards for both particulate matter and ozone.³ These pollutants, which are emitted by oil and gas drilling and fracking operations, stunt children's lung development, contribute to the formation of chronic lung and heart diseases, trigger asthma and heart attacks, and are correlated with premature death.⁴ New drilling in the region would threaten the health of low-income communities and communities of color already harmed daily by toxic air pollution.

A large and growing body of published scientific research has documented that fracking and other oil and gas development activities have wide-ranging, adverse impacts on species and ecosystems. The Bakersfield Field Office's 2012 Environmental Impact Statement reported 120 different known or probable vegetation species, as well as over 40 federally listed animal species, within the planning area. Previous BLM NEPA reviews stated that over 300 species of birds, mammals, reptiles, and amphibians occur or have the potential to occur within the Central Coast Field Office planning area, including 80+ species of rare, threatened, and endangered plants and animals. At a minimum, BLM must not allow oil and gas activities in critical habitat and areas known to be occupied by these special status species.

Since BLM's last planning for the Central Coast and Bakersfield areas, California has enacted significant protective measures limiting oil and gas activities. For one, California banned fracking in 2020 and ceased issuing fracking permits in 2024. Should BLM allow new fossil fuel development, it must adhere to California law and the wishes of its residents and not allow fracking on lands BLM administers in the State.

BLM must also adhere to the landmark law Senate Bill (SB) 1137, which requires a 3,200-foot setback between new and reworked oil and gas wells and facilities and all homes, schools, and other sensitive receptors. Another bill, Assembly Bill (AB) 617 (2017), created a Community Air Protection Program that is focused on reducing exposure in communities most impacted by air pollution. BLM must require operators to adhere to these requirements as well.

³ EPA, Cal. Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/anayo_ca.html.

⁴ U.S. EPA, Integrated Science Assessment for Particulate Matter, https://www.epa.gov/isa/integrated-science-assessment-isa-particulate-matter; Brook, Robert et al, Particulate Matter Air Pollution and Cardiovascular Disease, Circulation (2010),

https://www.ahajournals.org/doi/full/10.1161/CIR.0b013e3181dbece1; U.S. EPA, Health Effects of Ozone Pollution, https://www.epa.gov/ozone-pollution/health-effects-ozonepollution.

⁵ See, e.g., Scientists' warning on fossil fuels at 9.

⁶ BLM, Proposed Resource Management Plan and Final Environmental Impact Statement for the Bakersfield Field Office, Volume One at 246 (2012).

⁷ Executive Department, State of California, Executive Order N-70-20, Gavin Newsom (Sept. 23, 2020), https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf; Cal. Code Regs. tit. 14, § 1780(d) (2024).

⁸ Pub. Resources Code §§ 3280 – 3291; SB 1137, 2022 Leg., Reg. Sess. (Cal. 2022). SB 1137 also requires range of engineering controls for all wells to mitigate pollution on nearby communities. *Id.*⁹ AB 617, 2017 Leg., Reg. Sess. (Cal. 2017).

In the name of community wellbeing and health, air and water quality, ecosystems and wildlife, and the climate, we demand that you not open additional areas in BLM's Central Coast and Bakersfield planning areas for fossil fuel development. We also urge you to consider the alternative of a managed decline of existing fossil fuel development within these two planning areas.

Thank you,

Robert van de Hoek, Environmental

Scientist

mank you,	
350 Bay Area Action	Bay Area-System Change not Climate
Nora Privitera, Federal Legislative Action	Change
Team Chair	David Gassman, Co-convenor
350 Conejo / San Fernando Valley	California Interfaith Power & Light
Alan Weiner, Chapter Lead	Bekah Estrada, Southern California
350 Humboldt	Director
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Member	Andrew Christie, President
350 Sacramento	Californians for Western Wilderness
Katie McCammon, Program Director	Michael J. Painter, Coordinator
350 Santa Barbara	CalWild
350 Santa Barbara Carol Millar, Steering Committee Member	CalWild Linda Castro, Assistant Policy Director
Carol Millar, Steering Committee Member	Linda Castro, Assistant Policy Director
Carol Millar, Steering Committee Member Acevedo Media LLC	Linda Castro, Assistant Policy Director Center for Biological Diversity
Carol Millar, Steering Committee Member Acevedo Media LLC Alicia Acevedo, Creative Director	Linda Castro, Assistant Policy Director Center for Biological Diversity Cooper Kass, Staff Attorney, Climate Law
Carol Millar, Steering Committee Member Acevedo Media LLC Alicia Acevedo, Creative Director Amazon Watch	Linda Castro, Assistant Policy Director Center for Biological Diversity Cooper Kass, Staff Attorney, Climate Law Institute Central California Asthma
Carol Millar, Steering Committee Member Acevedo Media LLC Alicia Acevedo, Creative Director Amazon Watch Paul Paz y Miño, Deputy Director American Academy of Pediatrics,	Linda Castro, Assistant Policy Director Center for Biological Diversity Cooper Kass, Staff Attorney, Climate Law Institute Central California Asthma Collaborative
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Climate Hawks Vote

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Dayenu: A Jewish Call to Climate

Action

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Kayla Karimi, Staff Attorney

The Climate Center

Ellie Cohen, Chief Executive Officer

The Last Plastic Straw

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Sofia Carrasco, Youth v. Oil Intern