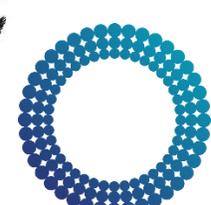




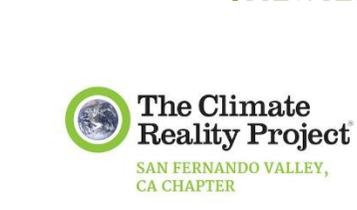
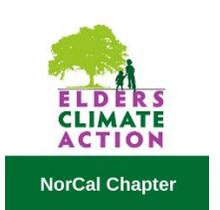
CAUSE
Central Coast Alliance United for a Sustainable Economy



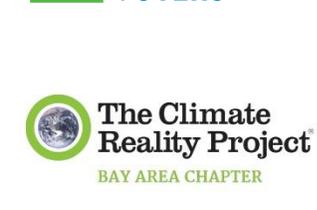
COMMUNITIES for a BETTER ENVIRONMENT
est. 1978



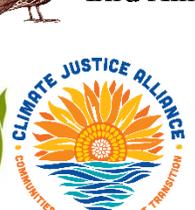
DAYENU
A Jewish Call to Climate Action



350 SACRAMENTO **350 Conejo** San Fernando Valley



CLIMATE HAWKS VOTE

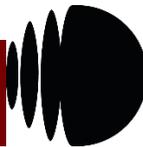


Coastal Lands CLAN Action Network



INDIVISIBLE SF





© Animals Are Sentient Beings, Inc. 2011
Take Action for Animals
www.animalsaresentientbeings.org





March 13, 2026

Bureau of Land Management
Attn: Sarah Mathews, Project Manager

Submitted via eplanning

Re: Notice of Availability of the Draft Central Coast Field Office Oil and Gas, Leasing and Development Supplemental Environmental Impact Statement, California [A2407-014-004-065516; O2509-014-004- 125222], 91 Fed. Reg. 1329 (Jan. 13, 2026)

Notice of Availability of the Draft Bakersfield Field Office Oil and Gas Leasing and Development Supplemental Environmental Impact Statement, California [A2407-014-004-065516; O2509-014-004- 125222], 91 Fed. Reg. 1330 (Jan. 13, 2026)

As environmental, public health and community groups with hundreds of thousands of members in California, we write to share our concerns with, and opposition to, the Bureau of Land Management (BLM)'s renewed proposal to open more than a million acres of public lands and mineral estate in California to oil and gas drilling and hydraulic fracturing (fracking).

1) BLM must recognize the climate crisis and the harms of oil and gas activity

As a first-order matter, we are opposed to BLM moving forward with its outdated plans to open new areas for oil and gas leasing. Doing so risks dire and unnecessary impacts to our communities, climate, wildlife, and more.

New oil and gas operations are incompatible with the urgent actions necessary to address the climate crisis.¹ Scientists are warning that the planet's fossil fuel "budget" has been overspent.² In other words, there is enough oil, gas, and coal in development and already being produced in open fields globally to take us far beyond livable climate targets. 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.³ Under the Central Coast and Bakersfield plans, BLM's forecasted fossil fuel development would

¹ While the federal government recently renounced its duty to regulate climate-polluting greenhouse gas emissions under the Clean Air Act, environmental groups have challenged that action in court. See Mark Drajem, "NRDC and Coalition Sue Over Endangerment Rollback and Climate Protections" (Feb. 18, 2026), <https://www.nrdc.org/press-releases/nrdc-coalition-sue-endangerment-rollback-climate-protections>. Regardless, federal law requires BLM to comply with state air pollution control standards, including those related to greenhouse gases. 43 U.S.C. § 1712(c)(8).

² 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>.

³ Scientists' warning on fossil fuels.

amount to the greenhouse gas emissions equivalent of *nearly five coal plants* operating for a year.⁴ Now, more than ever, we must keep fossil fuels in the ground.

In particular, BLM must consider that new drilling and fracking would further damage air quality in California. The San Joaquin Valley, which spans both the Bakersfield and Central Coast Field Office planning areas, is home to one of the most polluted air basins in the United States, failing to meet federal pollution standards for both particulate matter and ozone.⁵ For example, as recently as September 2025, EPA determined that the San Joaquin Valley failed to attain the 1997 8-hour ozone national ambient air quality standard (NAAQS) by its June 2024 “Extreme” area attainment date.⁶

These pollutants, which oil and gas drilling and fracking operations emit, 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.⁷ New drilling in the region would threaten the health of low-income communities and communities of color already harmed daily by toxic air pollution.

We are also concerned about proposed drilling near valued public spaces like Sequoia, Kings Canyon, and Yosemite National Parks; Carrizo Plain National Monument; the Los Padres, Sierra, and Sequoia National Forests; and state and county parks and beaches. As noted below, the Bakersfield draft environmental review does not analyze impacts to recreation at all. Such impacts cannot be ignored.

2) BLM must amend its Resource Management Plans

BLM is proposing *not* to amend the Resource Management Plans (RMPs) for both the Central Coast and Bakersfield field offices, issued in 2019 and 2014, respectively. This is unacceptable.

To reflect the flood of new information and changed circumstances on the resources named above, BLM must amend both plans. The amendments must take into account new data arising since the RMPs regarding the serious public health impacts of oil and gas drilling, the accelerating climate crisis, continually deteriorating air quality throughout both regions, newly-listed and candidate species like the foothills yellow-legged frog monarch butterfly, and new laws like SB 1137.

⁴ Calculation reached by adding together CCFO and BKFO 20-year CO₂e projections and EPA’s Greenhouse Gas Equivalencies Calculator, <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>.

⁵ EPA, Cal. Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/anayo_ca.html.

⁶ 90 Fed. Reg. 46065 (Sept. 25, 2025), <https://www.federalregister.gov/documents/2025/09/25/2025-18636/finding-of-failure-to-attain-the-1997-8-hour-ozone-standards-california-san-joaquin-valley>.

⁷ 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.0b013e3181dbee1>; U.S. EPA, Health Effects of Ozone Pollution, <https://www.epa.gov/ozone-pollution/health-effects-ozonepollution>.

Based on these changes and new information, BLM should consider and analyze closing unleased federal surface and mineral acres in the Central Coast and Bakersfield planning areas to oil and gas leasing and halting any planned expansion.

3) BLM's draft environmental reviews are too narrow and don't consider important impacts

Both draft supplemental environmental impact statements (SEISs) are flawed and must be fixed.

First, the Bakersfield draft SEIS is too narrow and limited to fracking. This is despite California's fracking ban and new information and changed circumstances on many environmental issues (see examples above) impacting the planning and leasing areas.

Second, both draft SEISs arbitrarily ignore key issues that could have significant impacts and where there is new information warranting analysis. The Bakersfield draft SEIS fails to discuss impacts on environmental justice, recreation, seismicity, and more. The Central Coast draft SEIS fails to discuss, for example, health and safety, environmental justice, and seismicity. Moreover, for many of the issue areas BLM does mention in the draft SEISs, BLM defers any actual analysis to an undetermined date in the future when operators seek drilling permits. BLM must not put off assessing and disclosing impacts now and in the context of its proposals as a whole.

Finally, the draft SEISs ignore that 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.⁸ BLM must improve its analysis of fossil fuel activities on wildlife and special-status species, including those species that have been given Endangered Species Act and/or California Endangered Species Act protection since its previous actions. These species include the foothill yellow-legged frog, Crotch's bumblebee, Temblor legless lizard, and monarch butterfly.

4) BLM must adhere to California's health and environmental laws

Since BLM's last planning process for the Central Coast and Bakersfield areas, California has enacted significant protective measures regulating oil and gas activities. California announced the need to ban fracking in 2020 and ceased issuing fracking permits in 2024.⁹ California also passed SB 1137, which requires a 3,200-foot buffer between new and reworked oil and gas wells and facilities and all homes, schools, and other sensitive receptors.¹⁰ Should BLM allow new fossil fuel development, it must adhere to California law on lands BLM administers in the State.

⁸ See, e.g., Scientists' warning on fossil fuels at 9.

⁹ 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).

¹⁰ 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.*

5) BLM must adequately engage with Tribal communities in California

The proposal will affect several Tribal Nations in California and the health of their ancestral homelands including the Yokut, Kawaiisu, Kitanemuk, Chumash, Salinan, Miwok, Mono, Tubatulabal, Tatataviam, Paiute, Tongva and Ohlone peoples. Indigenous Peoples have been the original caretakers of the lands and waters for millennia and continue to practice reciprocal relationships as part of their inherent right to Tribal sovereignty and inherent relationships with nature. The expansion of hydraulic fracking and any new oil drilling will disrupt the stewardship that Tribal Nations in California practice to restore the damage caused by past and ongoing extractive systems.

It is also crucial to recognize that Indigenous Peoples are commonly excluded from decision-making, which causes disproportionate impacts within their traditional territories; the 45 day scoping period is not an adequate amount of time for Tribal Nations to share their concerns. The NOI process is an insufficient strategy to properly engage and provide meaningful consultation and does not follow E.O. 13175. The BLM is expected to honor Tribal Sovereignty for all Tribal Nations in California, including nonfederally recognized tribes as they have inherent sovereignty of their ancestral homelands.

Conclusion

In the name of community wellbeing and health, the climate, air and water quality, and ecosystems and wildlife, we ask that you not open additional areas in BLM's Central Coast and Bakersfield planning areas for fossil fuel development. We further urge you to amend the RMPs and accordingly update, improve and recirculate the draft SEISs for public input.

Thank you,

198 methods

Drew Hudson, Founder

350 Bay Area Action

Nora Privitera, Chair, Federal Team

350 Conejo / San Fernando Valley

Alan Weiner, Chapter lead

350 Sacramento

Katie McCammon, Co-Executive Director

350 Santa Barbara

Carol Millar, Steering Committee Member

Alaula Kipuka Refuge

Yumi Teresa Radtke Kawano,
Copresident

Amazon Watch

Paul Paz y Miño, Deputy Director

Animals Are Sentient Beings, Inc.

Sarah Stewart, President

Ballona Wetlands Institute

Robert van de Hoek, Environmental Scientist

Battle Creek Alliance & Defiance Canyon Raptor Rescue

Marily Woodhouse, Director

Bay Area–System Change not Climate Change

David Gassman, Co-convenor

Benicians for a Safe and Healthy Community (BSHC)

Cathy Bennett, Representative

California Environmental Voters

Pa Houa Lee, Central Valley Regional Organizer

California Interfaith Power & Light

Gregory Stevens, Northern California Director

California Land Watch

Andrew Christie, President

CalWild

Linda Castro, Assistant Policy Director

Center for Biological Diversity

Victoria Bogdan Tejeda, Senior Attorney

Center on Race, Poverty & the Environment

Natalia Ospina, Legal Director

Central California Asthma Collaborative

Jenna Roper, PhD, Senior Policy Associate

Central California Environmental Justice Network

Nayamin Martinez, Executive Director

Central Coast Alliance United for a Sustainable Economy (CAUSE)

Jennifer Hernandez, Associate Policy Director

Change Begins With ME Indivisible

Tama Becker-Varano, Lead Organizer

Clean Water Action

Jesus Alonso, Community Organizer and EJ Advocate

Climate Action California

Janet Cox, CEO

Climate First: Replacing Oil & Gas (CFROG)

Haley Ehlers, Executive Director

Climate Hawks Vote

RL Miller, President

Climate Health Now

Ashley McClure, Executive Director

Climate Justice Alliance

Ariana Kretz, Policy Coordinator

**Climate Justice Committee, Unitarian
Universalist Church of Berkeley**

Sheila Tarbet, Chair

Climate Reality Project, Bay Area

Mary Dube, Chapter Chair

**Climate Reality Project, Orange County
Chapter**

Lisa Swanson, Policy Chair

Climate Reality Project, Sacramento

Shishpal Rawat, Chair

**Climate Reality Project, San Fernando
Valley**

Kathy Schaeffer, Legislative Coordinator

Coastal Lands Action Network (CLAN)

Dee Fromm, Managing Director

Committee for a Better Arvin

Estela Garcia, President

Communities for a Better Environment

Bahram Fazeli, Director of Research &
Policy

Conservation Lands Foundation

Kara Matsumoto, Public Lands Policy
Director

Consumer Watchdog

Liza Tucker, Consumer Advocate

Contra Costa MoveOn

Sheilah Fish, Founder

Courage California

Irene Kao, Executive Director

**Dayenu: A Jewish Call to Climate
Action**

Rachel Mandelbaum, Deputy Director of
Campaigns & Organizing

Defend Ballona Wetlands

Marcia Hanscom, Community Organizer

Earth Ethics, Inc.

Mary Gutierrez, Director

**Elders Climate Action (ECA) Northern
California (NorCal) Chapter**

Todd Weber, Volunteer, Chapter Co-
Leader

**Elders Climate Action (ECA) Southern
California (SoCal) Chapter**

Richard Burke, Founder, Chapter Leader

Endangered Habitats League

Dan Silver, Executive Director

**Environmental Action Committee of
West Marin**

Ashley Eagle-Gibbs, Executive Director

Environmental Defense Center

Maggie Hall, Deputy Chief Counsel

**Environmental Justice Ministry of
FUCSJ (First Unitarian Church of San
Jose)**

Anna Wagner, EJM co-lead

Food & Water Watch

Nicole Ghio, California Director

Fossil Free California

Sarah Norr, Campaigns Director

Friends of the Inyo

Wendy Schneider, Executive Director

Good Neighbor Steering Committee of Benicia

Kathy Kerridge, Board Member

GreenFaith

Anna Wagner, Development Director

GreenLatinos

Pedro Hernandez, California State Program Director

Greenpeace USA

Amy Moas, Ph.D., Climate Director

Health In Partnership

Sophia Simon-Ortiz, Senior Organizing Project Director

Human Nature

Jane Lapiner, Artistic Director

Indivisible Marin

Susan Morgan, Founder and Director

Indivisible Rolando Park

Audrey Ledesma, Founder and Leader

Indivisible San Francisco

John Anderson, Climate Working Group Lead

Indivisible San Jose

Rebecca Elliot, Admin

Indivisible Yolo

Chris Craig-Veit, Steering Committee Member

Latino Outdoors

Jazzari Taylor, Policy Advocate

Local Clean Energy Alliance

Jessica Guadalupe Tovar, Executive Director

Los Angeles Climate Reality Project

Charles Miller, Chair

Los Padres ForestWatch

Carla Mena, Director of Policy & Legislative Affairs

Mount Diablo Bird Alliance

Juan Pablo Galvan Martinez, Conservation Chair

Nevada County – Climate Action Network

Don Rivenes, Coordinator

North American Climate, Conservation and Environment (NACCE)

Jerry Rivers

Ocean Conservation Research

Michael Stocker, Director

Oil and Gas Action Network

Ilonka Zlatar, California Organizer

Oil Change International

Allie Rosenbluth, US Campaign Manager

Orchard City Indivisible

Celeste Walker, Co-Founder & Chair

Pelea Movement

Natalie Mebane, Chief Executive Officer

Pelican Media

Judy Irving, Executive Director

**Peninsula Interfaith Climate Action
(PICA)**

Debbie Mytels, Chair

Physicians for Social Responsibility LA

Maro Kakoussian, Director of Climate and Health Programs

PODER

Antonio Díaz, Organizational Director

Presente.org

Matt Nelson, Executive Director

Protect Monterey County

Dr. Laura Solorio, President

Quaker Earthcare Witness

Keith Runyan, General Secretary

Resource Renewal Institute

Chance Cutrano, Director of Programs

RootsAction

David Swanson, Campaign Coordinator

Sacred Places Institute for Indigenous Peoples

Starry Insixiengmay, Program Admin & Communications Director

San Francisco Bay Physicians for Social Responsibility

Robert Gould, MD, President

SanDiego350

Joyce Lane, Board Member

Santa Clara County Medical Association

Emily Coren, Director of Governance and Advocacy

Save Mount Diablo

Juan Pablo Galvan Martinez, Senior Land Use Manager

Scientist Rebellion Turtle Island West

Michelle Merrill, Coordinator

Seven Circles Foundation

Michael Stocker, President

Sierra Club

Jackie Feinberg, National Lands Conservation Campaign Manager

Sierra Energy Reimagined

Jan Maes, Executive Director

**Sisters of Mercy of the Americas
Justice Team**

Mike Poulin, Justice Resource Manager

**Social Justice Ministry of Live Oak
Unitarian Universalists of Goleta**

Carolyn Chaney, Co-Chair

Spottswoode Winery, Inc.

Elizabeth Novak, President & CEO

Sunflower Alliance

Shoshana Wechsler, Co-Coordinator

Surfrider

Jennifer Savage, California Policy
Associate Director

The Climate Center

Ellie Cohen, Chief Executive Officer

**The Climate Reality Project: California
Coalition**

Andy Hattala, Policy Co-Lead

The Wilderness Society

Helen O'Shea, California State Director

Third Act SoCal

Phil Glosserman, Lead Facilitator

Transformative Wealth Management

Allan Moskowitz, CFP

Transition Sebastopol

Carla Grady, Admin

Turtle Island Restoration Network

Elizabeth Purcell, Environmental Policy
Coordinator

**Unitarian Universalist Justice Ministry
of California**

Antoinette Hollamon, Managing Director

**Unitarian Universalist Service
Committee**

Joshua Leach, Policy and Litigation
Analyst

Urban Tilth

Doria Robinson, Executive Director

Ventura Climate Coalition

Kathleen Wheeler, Co-founder

Waterspirit

Rachel Davis, Public Policy & Justice
Organizer

**West Berkeley Alliance for Clean Air
and Safe Jobs**

Janice Schroeder, Core Member

Wishtoyo Foundation

Mati Waiya, Founder and Executive
Director

**Women's Earth and Climate Action
Network**

Osprey Orielle Lake, Executive Director