

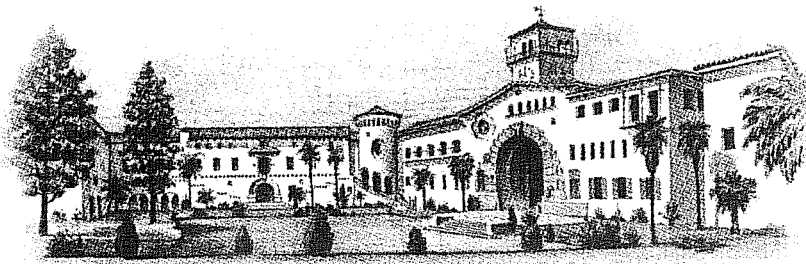
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COUNTY OF SANTA BARBARA

September 1, 2009

Minerals Management Service
Attention: Leasing Division (LD)
381 Elden Street, MS-4010,
Herndon, Virginia 20170-4817.

RE: 2010-2015 Oil and Gas Leasing in the Outer Continental Shelf

The County of Santa Barbara submits the following comments on the proposed draft program that addresses potential leasing decisions offshore California.

Foremost, the County requests that the U.S. Department of the Interior not issue any new leases off the coast of California as part of the 2010-2015 leasing program (see Board Resolution 09-092, including herein as Exhibit A).

However, should the Department of the Interior ignore this County's wishes and continue to consider new oil and gas leasing off our coast, we submit the following comments. First, the County submits comments on the scope of the Environmental Impact Statement that will be prepared to examine the environmental effects of the proposed leasing program (included herein as Exhibit B). The County remains concerned about the inadequacies of previous environmental documents that did not sufficiently inform leasing decisions. We particularly object to the practice of deferring adequate analyses to future steps in the process after the decision of where and when to lease has been made. As well noted by the U.S. Supreme Court in 1984 (*Secretary of the Interior vs. California*, 104 S. Ct. 656), "... a lease sale is a crucial step. Large sums of money change hands, and the sale may therefore generate momentum that makes eventual exploration, development, and production inevitable." Since the leasing program dictates the size, location, and timing of lease sales, this environmental review needs to be a comprehensive and complete examination of the potential effects of lease development that does not defer critical analyses to future steps in the process.

Second, the County strongly opposes any leasing within the Ecological Preserve offshore the City of Santa Barbara and unincorporated area of Montecito. Such an approach, as stated on page 8 of the draft proposed program, jeopardizes the preserve and removes the last remaining respite from offshore oil and gas development left by mass offshore leasing. Placing new platforms or prolonging the lives of very old platforms in proximity of this preserve provides no buffer

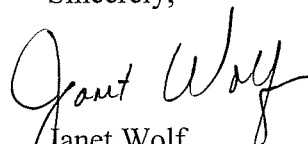
whatsoever to protect its unique ecology. The old platforms situated on the southeastern boundary of the preserve were installed between 1967 and 1979 and are not designed to accommodate newer directional-drilling equipment. Aside from significant impacts to the unique marine ecology, and air and water quality of the Santa Barbara Channel, this area is the hub of coastal recreation and tourism in Santa Barbara County.

Third, the Minerals Management Service poses a question about the use of mandatory unitization as a tool to reduce the number of offshore and onshore facilities required to develop offshore reserves by combining two or more leases into a single unit. The County understands the regulatory intent of unitization as one of conserving natural resources, preventing waste, or protecting correlative rights. Unitization can occasionally reduce the number of platforms and pipelines needed to develop a field, but should be employed conservatively to minimize the number of unitized leases necessary for efficient development of a single field and not unduly circumvent the due diligence requirements of individual leases.

However, the five-year leasing program can best achieve the objective of reducing the number of offshore and onshore facilities in any one area by substantially reducing the number of tracts offered for sale. The current proposal of mass leasing offshore Santa Barbara County far exceeds this region's capacity to accommodate it without commensurate mass industrialization in offshore and onshore areas. Given the extent of historic and current development offshore and onshore Santa Barbara County, no new leases should be offered in the 2010-2015 period.

Please contact Doug Anthony, Deputy Director of the County's Energy Division at (805) 568-2046 if you have questions.

Sincerely,



Janet Wolf
Vice Chair

CC: Governor Arnold Schwarzenegger, State of California
U.S. Senator Diane Feinstein, California
U.S. Senator Barbara Boxer, California
U.S. House of Representatives Member Lois Capps, Santa Barbara
Ellen Aronson, Regional Manager, Minerals Management Service, Pacific OCS Region
Brian Baird, Assistant Secretary, California Resources Agency
Alison Dettmer, Manager - Energy and Ocean Resources, California Coastal Commission

Exhibits: A. Board of Supervisors Resolution 09-092
B. Comment of Scope of EIS