



## Keep Sespe Wild Committee

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### APPEAL HEARING ON 19 NEW OIL WELLS IN SANTA PAULA CANYON, VENTURA COUNTY BOARD OF SUPERVISORS, OCTOBER 20, 2015

Members of the Board of Supervisors,

Keep Sespe Wild Committee is a volunteer non-profit based on the watershed of Sespe Creek in Los Padres National Forest. We regularly provide comments on issues related to other local watersheds in Ventura County.

The Southern California steelhead were listed as a federal endangered species on August 19, 1997. Santa Paula Creek is part of the larger Santa Clara River system, which is a designated Core 1 steelhead population in the Southern California Steelhead Recovery Plan. Core 1 populations have the highest priorities for protection and recovery within the endangered distinct population segment of steelhead in Southern California.

Santa Paula Creek is an important steelhead spawning and rearing tributary, one of the three most important in the entire Santa Clara River watershed - the other two being Sespe Creek and Piru Creek. Santa Paula Creek is designated as critical habitat for the endangered Southern California steelhead population. Any "adverse modification" of this critical habitat, such as from an oil spill, is considered a "take" of steelhead under the federal Endangered Species Act.

A great deal of time, effort and money has been expended at the local, state and federal levels to restore the steelhead runs of the Santa Clara River system. It is important to ensure that this investment is protected from ill-conceived and inadequately regulated oil development.

The southern California Steelhead Recovery Plan identifies significant threats to endangered steelhead - these include pollution of steelhead habitat from point and nonpoint sources of pollution, including contaminants originating from oil field operations.

The Southern California Steelhead Recovery Plan also includes recovery actions for Santa Paula Creek, including the prevention and control of point and nonpoint sources of pollution - and the review of NPDES waste discharge permits and stormwater permits issued by the Regional Water Quality Control Board's to ensure adequate protection of the beneficial uses the waters of the Santa Clara river system. These beneficial uses include "cold water, spawning and rearing," habitat and "contact and non-contact recreational activities".

The State and the Regional Water Quality Control Boards, however, do not control land uses per se - which are the responsibilities of cities and counties. It is therefore important to ensure adequate regulation and permitting of land-use activities such as the location and installation of wells (and appurtenant facilities such as roads) by local jurisdictions.

There should be no further oil development in the floodplain of Santa Paula Creek, and a full ~~SUBSEQUENT~~ Environmental Impact Report must be prepared in order to establish the proper protections for the Southern Steelhead, which were listed as a federal endangered species since these 19 oil wells were first proposed.

We thank you for this opportunity to comment,

Alasdair Coyne,  
Keep Sespe Wild Committee, Ojai