

April 27, 2026

Susan Zaleski  
Acting Regional Supervisor, Office of Environment  
BOEM, Pacific OCS Region  
760 Paseo Camarillo, Suite 102  
Camarillo, CA 93010  
(805) 384-6328

*Submitted via SantaClaraDPPComments@BOEM.gov*

**Re: Comments re BOEM's Decision to Approve, Disapprove, or Require Modifications to DCOR LLC's Updated Development and Production Plan**

Dear Ms. Zaleski:

This comment letter is submitted by the undersigned environmental and community organizations regarding the Bureau of Ocean Energy Management's (BOEM) consideration of DCOR, LLC's ("DCOR") Updated Development and Production Plan ("Updated DPP"). The Updated DPP proposes to conduct hydraulic fracturing ("fracking") from Platform Gilda, offshore Ventura County. Our organizations are committed to protecting the California coastline from the harmful effects of offshore oil and gas drilling, and we are particularly concerned about the heightened risks that fracking poses to the environment and local communities.

Offshore fracking has no place in our ocean. The proposal to allow fracking from Platform Gilda poses unacceptable risks to wildlife, public health, cultural resources, coastal economies, and climate goals. We strongly urge BOEM to **DISAPPROVE** the Updated DPP.

Critically, BOEM is already subject to a federal-court injunction that prohibits the agency from approving fracking and other forms of offshore well stimulation in federal waters off the California coast. In *Environmental Defense Center v. BOEM*, the Ninth Circuit ruled that BOEM's approval of these unconventional oil drilling methods without adequate analysis violated environmental laws.

Disapproval of DCOR's Updated DPP is mandated by the Outer Continental Shelf Lands Act (OCSLA) because the proposed fracking activities will cause prolonged serious environmental harm that greatly outweighs any advantages of fracking.<sup>1</sup> Fracking is also inconsistent with Coastal Zone Management Act (CZMA) objectives "to preserve, protect, develop, and where possible, to restore or enhance, the resources of the Nation's coastal zone,"<sup>2</sup> which necessitates disapproval of the Updated DPP pursuant to OCSLA.<sup>3</sup>

In addition, BOEM cannot approve the Updated DPP prior to complying with key environmental laws. For example, the agency's fast-tracked environmental review for the Platform Gilda proposal impedes public participation and undermines the transparency and fairness that the National

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<sup>1</sup> 43 U.S.C. § 1351(h)(1)(D); 30 C.F.R. § 550.271(d).

<sup>2</sup> 16 U.S.C. § 1452(1).

<sup>3</sup> 43 U.S.C. §§ 1351(h)(1)(B), 1344(a)(1-2); 30 C.F.R. § 550.271(b).

Environmental Policy Act (NEPA) requires. The attempt to justify this timeline based on the so-called “energy emergency” is inappropriate because there is no sudden or unforeseen crisis requiring immediate action to protect public safety or national security.

The Final Environmental Impact Statement (EIS) BOEM released glosses over the many impacts of these practices and is fundamentally flawed. Before BOEM proceeds with any action that enables offshore fracking, it must fully evaluate the effects to the human environment that will stem from the proposal to conduct fracking from Platform Gilda. It must also circulate a draft EIS for public review and comment.<sup>4</sup>

Offshore fracking causes environmental impacts beyond those of conventional offshore oil and gas development by producing water and air pollution, increasing the risk of earthquakes and oil spills, and prolonging the life of aging infrastructure and our use of dirty fossil fuels.

Fracking offshore exposes California’s coastline and communities to profound harm. Chemicals used in offshore fracking pose significant health risks to people and wildlife; these include reproductive harm, neurotoxicity, cancer and even death. According to a scientific review of chemicals used for fracking off California (before it was prohibited), at least 10 could kill or harm a broad variety of marine species, including sea otters, fish and benthic invertebrates. Even if some of the well-treatment chemicals are reinjected after fracking, spills and wastewater discharges create a pathway for environmental contamination. This poses risks to blue whales, sea otters, commercial fisheries, and coastal tourism.

Fracking will also increase air pollution. Many chemicals emitted during fracking are designated as hazardous air pollutants, which can enter the air during the venting of gases during fracking or the evaporation of chemicals from fracking, leading to dangerous human exposures. Fracking will also increase oil and gas production, polluting communities that live near processing and refining facilities. The extraction, transport, and combustion of additional offshore oil will also produce substantial carbon pollution deepening our climate crisis—emissions that are entirely avoidable.

Offshore fracking increases the likelihood of an oil spill by subjecting wells, casings, and aging platform infrastructure to additional pressure, chemical exposure, and mechanical stress. Any oil spill in this region would be devastating. Even small releases can cause harm to this sensitive region that provides important habitat to endangered species, including whales, seabirds, and fish. BOEM must fully examine these risks, including worst-case discharge scenarios, and the long-term ecological and economic harm that a single accident could inflict on California’s coast.

BOEM must also evaluate how this action will prolong offshore oil and gas activities off California. Platform Gilda was installed over forty years ago, at which time BOEM assumed the lifespan would be 30 to 40 years. The aging infrastructure should be decommissioned and the habitat restored rather than extend its use with fracking. Moreover, the prolonged production activities all come with additional environmental consequences that include prolonged air and water pollution.

Fracking and associated oil development also negatively impacts Tribal and cultural resources. The Santa Barbara Channel holds cultural and spiritual significance for Chumash people and their traditions. California’s ocean and coastline contain sacred sites, submerged landscapes, traditional fishing

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<sup>4</sup> 30 C.F.R. § 550.269(c).

areas, and cultural resources that have been stewarded since time immemorial. BOEM must examine the potential impact of its action on these cultural resources.

Should BOEM choose to move forward despite the overwhelming reasons to reject offshore fracking outright, the agency must first prepare a rigorous, science-based analysis that fully evaluates all environmental, health, cultural, and climate impacts. NEPA requires nothing less.

In addition, BOEM must fully comply with the wildlife protection mandates and procedures of the Endangered Species Act (ESA) with respect to the many imperiled species that rely on this region.

Finally, BOEM must adhere to the requirements of the CZMA and engage in the appropriate consistency review with the California Coastal Commission in order to respect the important coastal protection policies of the state. California's coast deserves protection, not renewed assault from high-risk fossil-fuel extraction. BOEM must also ensure compliance with the National Historic Preservation Act (NHPA) and the National Marine Sanctuary Act (NMSA).

In summary, we urge BOEM to disapprove the Updated DPP and ensure full and meaningful compliance with environmental laws. Any adequate analysis would counsel in favor of prohibiting offshore fracking in our irreplaceable Pacific Ocean.

Sincerely,

**Environmental Defense Center**  
Maggie Hall, Deputy Chief Counsel

**Center for Biological Diversity**  
Emily Jeffers, Senior Attorney

**350 Santa Barbara**  
Sharon Broberg, Steering Committee Member

**Azul**  
Marcela Gutierrez-Graudiņš,  
Founder/Executive Director

**Bixby Residential, Inc.**  
Grant Bixby, Principal Broker

**Business Alliance for Protecting the Pacific Coast (BAPPC)**  
Grant Bixby, Founding Member

**California Coastal Protection Network**  
Susan Jordan, Founder & Executive Director

**California Coastkeeper Alliance**  
Marty Farrell, Staff Attorney

**California Democratic Party**  
RL Miller, Environmental Caucus Chair

**California Land Watch**  
Andrew Christie, President

**CALPIRG Students** Jake Twomey, Board Chair

**Carpinteria Valley Association**  
Mike Wondolowski, President

**Center for Environmental Health**  
Thomas R. Fox, Senior Legislative Counsel

**Citizens Planning Association**  
Mary Ellen Brooks, President

**Clean Water Action**  
Andria Ventura, Legislative and Policy Director

**Climate First: Replacing Oil & Gas (CFROG)**  
Haley Ehlers, Executive Director

**Climate Hawks Vote**

RL Miller, President

**CLUE-EJ**

Blake Pritchard, Member

**CLUE-SB Environmental Justice Group**

Rachel Altman, Co-chair

**Coastal Band of the Chumash Nation**

Michael Khus-Zarate, Vice Chairman

**Committee for Land, Air, Water and Species (CLAWS)**

Nancy Black, Board President

**The C.O.R.E. Project**

Yehuda Ben-Hamo, Executive Director

**Defenders of Wildlife**

Victoria Molyneaux, Staff Attorney

**Environment California**

Kelsey Lamp, Protect Our Ocean Program Director

**Environment California**

Laura Deehan, State Director

**Environmental Action Committee of West Marin**

Isabel Dawson, Policy Associate

**Environmental Protection Information Center (EPIC)**

Matt Simmons, Climate Attorney

**Fish On**

Anupa Asokan, Founder and Executive Director

**Food & Water Watch**

Nicole Ghio, California Director

**Heal the Bay**

Kerry J. Nickols, Ph.D., Science and Policy Director

**Heal the Ocean**

Karina Johnston, Executive Director

**hi ho' stoqošlóq' hi xus (Chumash Bear Circle)**

Marianne Parra, Communications Outreach/Director

**International Marine Mammal Project of Earth Island Institute**

Mark J Palmer, Associate Director

**Isla Vista Surfrider**

Mary Holtam, President

**Mercury Press Inc.**

Nancy Black, CEO

**Oceana**

Joseph Gordon, Campaign Director

**Ocean Conservation Research**

Michael Stocker, Director

**Ocean Defense Initiative**

Basia Marcks, Sr. Program Director

**Pesticide Action and Agroecology Network (PAN)**

Margaret Reeves, Senior Scientist

**Sacred Places Institute for Indigenous Peoples**

Aolani Sanchez, Program Associate

**San Diego 350**

Joyce Lane, Board Member

**San Francisco Bay Physicians for Social Responsibility**

Robert M. Gould, MD, President

**Santa Barbara Channelkeeper**

Ted Morton, Executive Director

**Santa Cruz Climate Action Network**

Pauline Seales, Organizer

**Save Our Shores**

Katie Thompson, Executive Director

**Seven Circles Foundation**

Michael Stocker, Founder

**Sierra Club Santa Barbara Group**

Emily Engel, Group Chair

**SoCal 350 Climate Action**

Jack Eidt, Co-Founder

**Society of Fearless Grandmothers-SB**

Irene Cooke, Organizer

**Stand.earth**

Nathan Taft, Senior Campaigner

**Surfrider Foundation**

Bill Hickman, Sr. Manager Central California

**Turtle Island Restoration Network**

Elizabeth Purcell, Environmental Policy  
Coordinator

Joanie Steinhaus, Ocean Program Director

**Ventura Coastkeeper**

Mati Waiya, Executive Director

**WILDCOAST**

Yehuda Ben-Hamo, Coastal Conservation  
Manager

**Wishtoyo Foundation**

Mati Waiya, Executive Director