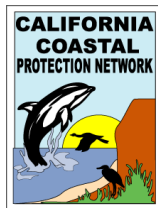




SACRED PLACES INSTITUTE
FOR INDIGENOUS PEOPLES



August 7, 2026

Meagan Harmon, Chair
California Coastal Commission
455 Market Street, Ste 300
San Francisco, CA 94105

Submitted via email to EORFC@coastal.ca.gov

**Re: DCOR Offshore Fracking Consistency Certification and Determination –
Items Th8a, 8b - OPPOSE**

Dear Chair Harmon and Commissioners,

This comment letter is submitted by the undersigned organizations to urge the California Coastal Commission (CCC) to **OBJECT** to both Consistency Certification No. CC-0001-26 and Consistency Determination No. CD-0005-26, concerning DCOR, LLC's ("DCOR") Updated Development and Production Plan ("Updated DPP" or "Project"). 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, wildlife, local communities, cultural resources and climate goals.

The Staff Reports appropriately conclude that the Project is inconsistent with the enforceable policies of the California Coastal Management Program (CCMP). Platform Gilda and its related infrastructure have been operating for 45 years—over two times their anticipated life span. Without this fracking Project, the platform would continue to decline in production and cease operations. Continuing and intensifying production on this aging infrastructure threatens the California coast with not only the risk of more oil spills, but the risk of spills of toxic fracking fluids. Accordingly, the Staff Reports correctly conclude "the proposed fracking program would materially increase the risk of a spill of crude oil and other hazardous substances by extending and intensifying the use of aging infrastructure." DCOR has not demonstrated effective containment and clean up measures in place in the event of such a spill, which gives rise to an inconsistency with Section 30232 of the Coastal Act.

As the Staff Reports point out, "DCOR's facilities have been involved in two of the three most significant offshore spill incidents in the past five years." The impacts posed by fracking at Platform Gilda, including the risk of another spill, are unacceptable.

The risk of an oil spill and other toxic substances also threatens the biological productivity of the Santa Barbara Channel region and its many sensitive species, including whales, seabirds, and fish. The discharge of produced water, which may contain fracking fluids, further threatens marine life. Offshore fracking could also impair commercial and recreational

fishing, contribute to coastal hazards, and impede public access and recreation. For these reasons, the Project is inconsistent with many policies of the CCMP.

Moreover, 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 areas, and cultural resources that Chumash people have stewarded since time immemorial. The proposal for offshore fracking and prolonged drilling from Platform Gilda continues to threaten these cultural resources.

Likewise, offshore fracking increases air pollution, including smog-forming pollutants and greenhouse gases. Many chemicals emitted during fracking are also designated as hazardous air pollutants. Importantly, this fracking proposal will increase production by 14 million barrels of oil and 13 million cubic feet of gas over 20 years. This will contribute significantly to air pollution across the entire lifecycle of oil and gas production. The affected coastal region in Ventura County already violates air quality standards for smog. Additionally, fracking operations and supporting activities, such as vessel trips and high-pressure drilling, release methane and other air pollutants that contribute to smog and climate change. Furthermore, because fracking would prolong the lifespan of Platform Gilda and oil production off the California coast, these air pollution effects could continue for decades.

The goal of the Coastal Act is to "protect, maintain, and . . . restore the overall quality of the coastal zone environment." Accordingly, the Commission should use the full extent of its authority to protect the California coast from the risks of prolonged oil and gas activities on aging offshore infrastructure. In summary, we urge the Coastal Commission to stand up for California's coast and OBJECT to the consistency certification and consistency determination for offshore fracking from Platform Gilda.

Sincerely,

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Business Alliance for Protecting the Pacific Coast
Grant Bixby, Founding Member

Oceana
Joseph Gordon, Campaign Director

Surfrider Foundation
Jennifer Savage, California Policy Associate Director

Sierra Club California
Gabriela Facio, Senior Policy Strategist

Environmental Defense Center
Maggie Hall, Deputy Chief Counsel

Coastal Band of the Chumash Nation
Mati Waiya, Tribal Chair

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

Azul
Tomas Valadez, California Policy Manager

California Coastal Protection Network
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The Climate Center

Woody Hastings, Phase Out Polluting Fuels
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Sarah Winter Whelan, Director

Humboldt Waterkeeper

Jennifer Kalt, Executive Director

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

Mark J. Palmer, Associate Director

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Basia Marcks, Sr. Program Director

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Allie Rosenbluth, US Campaigns Manager

Orange County Coastkeeper

Garry Brown, President and CEO

Paddle for Peace

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Robert J. van de Hoek, Environmental
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**Physicians for Social Responsibility - Los
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Joyce Lane, Endorsement Committee
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Save Our Shores

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**Social Justice Ministry, Live Oak
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Carolyn Chaney, Co-chair

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Irene Cooke, Organizer

Turtle Island Restoration Network

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