



December 2, 2011

Santa Barbara County
Board of Supervisors
105 East Anapamu Street, Suite 407
Santa Barbara, California 93101

RE: Hydraulic Fracturing

Dear Chair Gray & Members of the Board,

The **Environmental Defense Center** (EDC), on behalf of the **Carpinteria Valley Association** (CVA), **Get Oil Out!** (GOO!), the **Los Padres Sierra Club** (Sierra Club) and the **Santa Barbara County Action Network** (SBCAN), offer the following comments for your December 6, 2011, hearing on hydraulic fracturing (or “fracking”).

CVA is a non-profit public interest group comprised of area residents who participate in issues that affect the community of Carpinteria, including land use issues and issues affecting water use, habitats, open spaces and the quality of life in Carpinteria. GOO! is a non-profit corporation whose mission is to protect the natural environment and beauty of the Santa Barbara Channel from the adverse effects of oil development. Sierra Club’s conservation interests encompass everything from National Forest Wilderness areas of the Santa Ynez Mountains to the Channel Islands National Park in the Santa Barbara Channel. Sierra Club’s activities range from traditional concerns with forest management and wilderness to urban issues including growing problems with land use and energy development. SBCAN works within Santa Barbara County to promote social and economic justice, to preserve environmental and agricultural resources, and to create sustainable communities. EDC is a non-profit public interest law firm that represents community organizations in environmental matters affecting California’s south central coast.

Our organizations continue to support your efforts to regulate fracking and its incidental processes and waste products. We appreciate County staff’s and your Planning Commission’s efforts to align the language of the County Code with its intended application. We encourage you to adopt staff’s recommendations.

Santa Barbara has already hosted some of the first fracking wells in California, and residents throughout the County are at risk from this invasive practice. Impacts

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associated with fracking include surface and groundwater pollution, air pollution and increased rates of subsidence and/or earthquakes.

Staff has confirmed that hydraulic fracturing requires approval of an Oil Drilling and Production Plan, and recommends a clarifying amendment to the LUDC. We appreciate this acknowledgement that any future application to frack a well will require environmental review under the California Environmental Quality Act (CEQA), including the disclosure of pertinent information necessary to assess potential impacts to public health and safety, and the environment. Disclosure of the hazardous and toxic constituents of the fracking process is a critical safeguard. A comprehensive list of the potentially hazardous and/or toxic constituents used to frack should be included in the Project Description section of any environmental review documents associated with fracking.

It is incumbent upon your Board to stringently regulate the practice of fracking to the extent of the County's local land use authority and inherent police powers. Thank you for taking action to protect our environment and the health of our communities.

Respectfully submitted,

/s/

Nathan G. Alley
Staff Attorney

/s/

Brian P. Segee
Staff Attorney

cc: Carpinteria Valley Association
Get Oil Out!
Los Padres Sierra Club
Santa Barbara County Action Network