

Katherine Douglas

Public Comment - CFROG

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From: Haley Ehlers <haley@cfrog.org>
Sent: Monday, October 20, 2025 1:43 PM
To: sbcob
Subject: Agenda Item 3 - Oil & Gas Phase Out
Attachments: Agenda Item 3_CFROG_102025.pdf

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Hello,

Please find a comment letter from Climate First: Replacing Oil & Gas (CFROG) for Agenda Item 3 for tomorrow, 10/21/25 Board of Supervisors hearing.

Thank you,
Haley

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Haley Ehlers (she/her)

Executive Director

CFROG - Climate First: Replacing Oil & Gas

(805)263-7408 | haley@cfrog.org

www.cfrog.org



October 20, 2025

Board of Supervisors
Santa Barbara County
105 E. Anapamu Street
Santa Barbara, California 93101-2000

Re: Agenda Item 3

Dear Supervisors,

Climate First: Replacing Oil & Gas (CFROG) is a Central Coast advocacy organization dedicated to a just transition away from fossil fuels to protect our health, economy, and climate. We appreciate the opportunity to comment on this important initiative to phase out oil and gas operations in Santa Barbara to protect frontline community public health and our climate. We are in support of staff recommendations.

An ordinance to prohibit new oil and gas drilling and phase out existing operations after a reasonable amortization period is well within the jurisdiction of the County to regulate oil and gas pollution. A new state law, [AB 3233](#), firmly establishes that the County has this authority and would not be preempted by state oil and gas law in doing so. We have attached a letter outlining this legal authority by Shute, Mihaly & Weinberger, originally submitted April 21, 2025.

A phase out of oil and gas is consistent with the following important Santa Barbara and California policies and findings:

- [Santa Barbara County 2030 Climate Action Plan](#). LCE1.3 calls for a fossil fuel transition and for the county to consider “strategies to phase out fossil fuel extraction in an economically responsible way.”
- [California Executive Order B-55-18](#) committed California to achieve carbon neutrality by 2045.

We urge the Board to direct staff to draft the LUDC, CZO, and Petroleum Code amendments necessary to effectuate both a prohibition on the drilling of new oil and gas wells and a phase-out of existing operations. We also encourage Supervisors to direct staff to review the General Plan to determine whether any concurrent amendments are necessary or advisable to ensure consistency between the General Plan and the LUDC, CZO, and Petroleum Code as amended.

Climate First: Replacing Oil & Gas

PO Box 23003, Ventura, CA 93002 (805)263-7408 info@cfrog.org www.cfrog.org

A strong phase out ordinance will address the variety of public health, economic, and environmental threats that oil and gas operations pose, including idle wells. The proposed second phase of the policy would target existing oil and gas facilities, including both operating and idle wells, for closure. Both active and idle oil and gas wells pose public health and climate threats. Research has found that [two-thirds of unplugged oil and gas wells in California](#) are leaking methane, a potent greenhouse gas that is nearly always accompanied by other pollutants harmful to human health, like volatile organic compounds (VOCs). Equally as important is the health harming pollution from active oil and gas wells, which a prohibition of new wells would immediately help address. The [California Oil & Gas Public Health Rulemaking Scientific Advisory Panel](#) found that oil and gas drilling during the active phase of a well contributed 23.7% of the total non-methane volatile organic compounds measured, while the idle period only contributed 0.6%.

We appreciate Santa Barbara County's leadership in moving forward with a managed and responsible transition away from harmful oil and gas drilling to protect our climate, communities, air, water, and economy.

Sincerely,
Haley Ehlers
Executive Director

Attachments:

- Letter from Kevin Bundy, Shute, Mihaly & Weinberger on the authority of Santa Barbara County Board of Supervisors to enact ordinance phase out oil and gas production.