

Katherine Douglas

Appellant Presentation - EDC # 6



From: Tara Rengifo <trengifo@environmentaldefensecenter.org>
Sent: Friday, December 12, 2025 11:16 AM
To: sbcob
Cc: Linda Krop
Subject: EDC et al Comments on Agenda Item No. 6, Sable Change of Owner, Operator, and Guarantor
Attachments: 2025_12_12_EDC et al BOS Comments re Sable 25B w att_FINAL.pdf; 2025_12_12_EDC BOS Appeal PPT Presentation_FINAL.pptx

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To Whom It May Concern:

Attached please find comments submitted today to the Board of Supervisors by the Environmental Defense Center (EDC), on behalf of Get Oil Out!, Santa Barbara County Action Network, Sierra Club, by and through the Santa Barbara-Ventura Chapter, Santa Barbara Channelkeeper, and EDC, concerning Agenda Item No. 6, Change of Owner, Operator, and Guarantor for the Santa Ynez Unit, POPCO Gas Plant, and Las Flores Pipeline System.

Attached please also find Appellants' Powerpoint presentation for Agenda Item No. 6, December 16 Board of Supervisors hearing.

Please confirm receipt, inclusion in the record, and whether you also require a hard copy of the comments.

Thank you,
Tara



environmental
DEFENSE CENTER

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We recognize that EDC sits on occupied, unceded, stolen lands of the Chumash Peoples who have called this area home for time immemorial. We commit today to make space to elevate indigenous voices and support our local Chumash and indigenous communities in our work to protect our environment.

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LOS PADRES CHAPTER



OPPOSE Sable's Applications for Change
of Owner, Operator, and Guarantor

The Board Cannot Make the 25B Findings

- Does Sable have the skills, training, and resources necessary to operate the Facilities in compliance with the Permits and County ordinances? **NO**
- Compliance with all requirements of the Permits? **NO**
- Have all necessary insurance, bonds, and other methods of financial responsibility been provided to demonstrate that *Sable* can respond to an oil spill or accident and abandon the Facilities? **NO**

FAILURE TO MAKE EVEN ONE OF THESE FINDINGS MUST RESULT IN DENIAL.

Desmond v. County of Contra Costa (1993) 21 Cal.App.4th 330, 336-37.

Chapter 25B's Operator Capability Finding

Chapter 25B-10(a)(9):

The proposed operator has the skills, training, and resources necessary to operate the permitted facility in compliance with the permit and all applicable county codes.

Interpreting the Operator Capability Finding

Petitioners' narrow construction of finding 10(a)(9) is contrary to the plain language of the ordinance. There is no language in the ordinance that limits what the decision-maker may consider when evaluating the proposed operator's skills, training, and resources. Certain relevant records must be considered to evaluate past compliance, but there is nothing precluding the decision-maker from considering any other information or records it deems necessary:

Santa Barbara County Counsel, *Sable Offshore Corp., et al. v. County of Santa Barbara, et al.*, Case No. 2:25-cv-04165-DMG

Additional Evidence Supporting Denial

- Evidence of Sable Undertaking Activities Without Notifying Agencies:
 - Sable's unpermitted work in coastal areas
 - Felony complaint against Sable
- Evidence of Sable Ignoring Agency Directives:
 - OSFM letter to Sable
 - CalGEM bonding demands
 - County NOV
 - State Parks Right-of-Way authorization

Insufficient Evidence of Financial Resources to Pay for Abandonment or Spill Cleanup

	2 nd Quarter 2025	3 rd Quarter 2025
Unrestricted cash	\$247.1 million	\$41.6 million
Debt	\$875.6 million	\$896.6 million
Net loss	\$128.1 million	\$110.4 million
Going Concern Disclosure	“Substantial doubt” re Sable’s ability to continue	“Substantial doubt” re Sable’s ability to continue

^[1] Sable Offshore Corp., *U.S. Securities and Exchange Commission Form 10-Q* at 3 (August 12, 2025), available at: <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001831481/307c3806-d22a-4dd0-9a99-cc9c5de4bb4a.pdf>.

^[2] Sable Offshore Corp., *U.S. Securities and Exchange Commission Form 10-Q* at 3 (November 13, 2025), available at: <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001831481/f3afd24a-1880-40c5-ba94-706b72297ef5.pdf>.

Chapter 25B's Permit Compliance Findings

Chapter 25B-9(a)(5) & 25B-10(a)(5):

As of the date that the application is deemed complete, the current operator is in compliance with all requirements of the permit, including any requirements of a county-required safety audit, any notice of violation, and any county ordinance, or the owner and proposed operator have entered into a written agreement with the director that specifies an enforceable schedule to come into compliance with such requirements.

Chapter 25B's Financial Assurance Findings

Chapter 25B-9(a)(2), 25B-9(e)(1), & 25B-10(a)(2):

All necessary insurance, bonds or other instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance have been updated, if necessary, to reflect the new owner(s) and will remain in full effect following the ownership change.

See also Chapter 25B-10(a)(9):

*The proposed operator has the ... **resources** necessary to operate the permitted facility in compliance with the permit and all applicable county codes.*



The Board Cannot Make the 25B Findings



We therefore ask the Board to:

- Revise the findings of denial;
- Deny the Applications; and
- Direct staff to cease allowing Sable to operate the Facilities.