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Katherine Douglas

Applicant Recusal Letter

From: Jessica.StebbinsBina@lw.com
Sent: Thursday, October 30, 2025 10:34 AM
To: Laura Capps
Cc: sbcob; Rachel Van Mullem; Roy Lee; Joan Hartmann; Supervisor Nelson; Steve Lavagnino; srusch@sableoffshore.com
Subject: Recusal letter - November 4, 2025 Board of Supervisors Hearing re: transfer of permits to Sable Offshore
Attachments: 2025.10.30 Sable - Chair Capps Recusal Letter.pdf

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Chair Capps, Counsel,

Please see the attached letter.

Thank you,

Jessica Stebbins Bina

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October 30, 2025

VIA EMAIL AND FEDEX

Chair Capps and Honorable Supervisors
County of Santa Barbara
Office of the Clerk of the Board
105 E. Anapamu Street, Room 407
Santa Barbara, CA 93101
sbcob@countyofsb.org

Rachel Van Mullem
County Counsel
County of Santa Barbara
105 E. Anapamu Street, Suite 201
Santa Barbara, CA 93101

Re: November 4, 2025, Meeting of the Santa Barbara County Board of Supervisors regarding Appeals of Planning Commission Approval of Change of Owner, Guarantor, and Operator for the Santa Ynez Unit, Pacific Offshore Pipeline Company Gas Plant and Las Flores Pipeline System – Request for Recusal of Chair Capps

Dear Chair Capps and Honorable Supervisors:

On behalf of Sable Offshore Corp. (“Sable”), Pacific Pipeline Company (“PPC”), and Pacific Offshore Pipeline Company (“POPCO”) (collectively, the “Applicants”), the Applicants request that Chair Laura Capps recuse herself from the November 4, 2025, vote on the appeals of the County Planning Commission’s (“Planning Commission”) October 30, 2024, approval of the Change of Owner, Guarantor, and Operator for the Las Flores Pipeline System (“Pipeline”), the Pacific Offshore Pipeline Company Gas Plant (“POPCO Facilities”), and the Santa Ynez Unit (“SYU”) (collectively, the “Facilities,” and the approvals, the “Transfers”), and from any subsequent matters involving the Transfers. Sable acquired the Facilities on February 14, 2024, from Mobil Pacific Pipeline Company (“MPPC”) and Exxon Mobil Corporation (“ExxonMobil”) and subsequently applied for the Transfers to change the names on the Facilities’ final development plan permits (“FDPs”) to Sable. The Planning Commission approved the Transfers on October 30, 2024, and those approvals were appealed (the “Appeals”) by various environmental advocacy groups to the Board of Supervisors (the “Board”). On February 25, 2025, the Board deadlocked 2-to-2 on the Appeals, resulting in no action.

The upcoming Board hearing is court-ordered. Applicants have obtained a writ of mandate from the United States District Court, Central District of California, compelling the

Board to act on the Appeals as required by County Code Chapter 25B. Thus, it is imperative that the Board reach a decision after a fair and impartial hearing.

However, Sable is concerned that the upcoming Board hearing on the Appeals will not be fair and impartial because of Chair Laura Capps' participation, given her substantial record of bias against the Applicants and the use of the Facilities. Chair Capps' office has proudly proclaimed that "Supervisor Capps has *consistently* demonstrated dedication [to climate action] principles, *having voted against proposals to restart this [P]ipeline* during prior Board of Supervisors hearings."¹ Chair Capps has taken these positions even though no application for Pipeline restart has ever been presented to the Board for its consideration, and County staff has acknowledged that "the [C]ounty has no authority to oversee [] state and federal restart requirements."² In line with Chair Capps' stated political objective to prevent the future operation of the Pipeline, Chair Capps has acknowledged that she voted against a previous proposal to install safety valves along the Pipeline as required by state law—a proposal that Chair Capps acknowledged she supported on the merits—simply "*because it was a way to restart the [P]ipeline.*"³ These comments reveal Chair Capps' willingness to disregard the merits of, and ultimately vote against, applications involving the Pipeline as a means to achieve her broader improper goal of blocking its future use.

Similarly, Chair Capps' comments during the February 2025 Board hearing on the Appeals confirm that she intends to vote to uphold the Appeals not because Sable has failed to comply with Chapter 25B's requirements, but because she does not want Sable to restart the Pipeline. Having acknowledged the straightforward requirements of Chapter 25B, Chair Capps nevertheless stated on the record that "I do feel I was elected to look at the big picture and to extrapolate [] what we're actually doing here,"⁴ and later framed her vote against the Transfers as a vote "*against Sable*" rather than on the narrow matter before the Board.⁵ Because Chair Capps has demonstrated an intent to use the Board's consideration of the Appeals as an opportunity to harm the Applicants and prevent the future use of the Pipeline, she must recuse herself from the upcoming hearing.

¹ The Daily Nexus, "Goleta City Council passes resolution against Sable Offshore restarting oil pipeline" (Feb. 14, 2025) at p. 3, <https://dailynexus.com/2025-02-13/goleta-city-council-passes-resolution-against-sable-offshore-restarting-oil-pipeline>, attached hereto as Ex. 1.

² Excerpts of Feb. 25, 2025 Board of Supervisors Hearing Transcript ("February Board Hearing Transcript") at p. 14, attached hereto as Ex. 2.

³ See Excerpts of "Episode 498: One on One with Laura Capps; June 6, 2025," NewsmakersWithJR, (June 6, 2025) Transcript attached hereto as Ex. 3 ("June 2025 Capps Interview Transcript"), at p. 2, video available at: <https://www.youtube.com/watch?v=u4gmxCnZvDM>.

⁴ February Board Hearing Transcript (Ex. 2), at p. 20.

⁵ See Chair Capps' (@supervisorlauracapps) Instagram Post (Feb. 25, 2025), attached hereto as Ex. 4, and available at: https://www.instagram.com/supervisorlauracapps/p/DGhN_m0pMb0/#.

It is well-settled that a public official must be an “**impartial, noninvolved reviewer**” in quasi-judicial matters.⁶ California courts have found an unacceptable probability of bias when public officials publicly criticize a project, become personally embroiled in it, or advise opponents. Chair Capps has done all three. **Her numerous statements evince prejudice and opposition to the Transfers and preclude her from impartially considering the Appeals. In the interests of fairness and good government, Applicants respectfully request her recusal.**

I. BACKGROUND

As the Board is aware, the Facilities are existing, permitted facilities authorized to process, treat, and transport crude oil and natural gas from offshore platforms in the Santa Barbara Channel. Following the 2015 Refugio oil spill, which took place under the prior operator of the Pipeline, offshore oil production at the SYU was suspended. Since then, the Facilities have been subject to ongoing inspection, preservation, and maintenance activities to maintain them in an active state. From March 2022 to September 2023, the Board heard several applications involving the Facilities submitted by former owners of the Facilities. These include: (1) a 2022 hearing concerning ExxonMobil’s interim trucking proposal to transport crude oil by truck from the Facilities to local refineries, which was denied by the Board (“ExxonMobil Interim Trucking Proposal”); (2) an August 2023 hearing on an appeal from the Planning Commission’s denial of PPC’s proposal to install legally required upgraded safety valves for the Pipeline (“Valve Upgrade Project”), which was not approved by the Board and which was the subject of follow-on litigation and an eventual settlement permitting the valves’ installation; and (3) a September 2023 hearing on a previous permit transfer appeal for the Pipeline from Plains Pipeline L.P. (“Plains”) to PPC, a Change of Guarantor from Plains to ExxonMobil, and a Change of Operator from Plains to ExxonMobil Pipeline Company (the “2023 Permit Transfer Appeal”), which was affirmed by the Board.

On February 14, 2024, the Applicants acquired full ownership of the Facilities from ExxonMobil and MPPC. Promptly thereafter on March 14, 2024, the Applicants submitted applications to the County to authorize the Transfers pursuant to County Code Chapter 25B. After working collaboratively with the Applicants, County staff deemed the applications complete on July 30, 2024, and subsequently recommended that the Planning Commission approve the Transfers. After a lengthy and thorough hearing—lasting approximately six hours—on October 30, 2024, the Planning Commission approved the Transfers by a vote of 3-to-1.

The two Appeals were filed by (1) the Center for Biological Diversity and Wishtoyo Foundation; and (2) the Environmental Defense Center, Get Oil Out!, and Santa Barbara County Action Network. On February 20, 2025, Planning and Development staff recommended that the Board deny the Appeals on the basis that the Applicants satisfied the requirements of Chapter

⁶ *Burrell v. City of L.A.* (1989) 209 Cal.App.3d 568, 581 *see also* *Woody’s Group, Inc. v. City of Newport Beach* (2015) 233 Cal.App.4th 1012, 1022–1023; *Nasha v. City of Los Angeles.* (2004) 125 Cal.App.4th 470, 483 (quoting *Gai v. City of Selma* (1998) 68 Cal.App.4th 213, 219).

25B. Under Chapter 25B, permit transfer is mandatory so long as the narrow requirements of the chapter—which largely focus on demonstrating that the new owner, operator, and guarantor of the permitted facilities have updated the permit information and agreed to comply with the FDPs’ requirements—are met. Both County staff and various Supervisors, including Chair Capps, have acknowledged that the requirements of Chapter 25B are in essence, a “checklist.” However, despite the staff recommendation and the Planning Commission’s prior approval, the Board failed to make a determination on appeal as a result of a 2-to-2 tie vote of the Supervisors with Supervisor Hartmann recusing herself based on her own longstanding conflict of interest. After the Board failed to act, County staff refused to transfer the FDPs, leaving Applicants in administrative and legal limbo.

On May 8, 2025, Applicants filed a Verified Petition for Writ of Mandate and Complaint for Declaratory Relief and Damages in the U.S. District Court, Central District of California against the County of Santa Barbara and the Board alleging, among other claims, that the County failed to comply with County Code Chapter 25B by failing to act on the appeals. On September 12, 2025, following a hearing on cross-motions for summary judgment, the court issued a peremptory writ of mandate ordering the Board to hold a new hearing to affirm, reverse, or modify the Planning Commission’s decision in compliance with Chapter 25B. In its order, the court explained that in deciding the Appeals, the Supervisors must comply with the requirements of Chapter 25B, noting that a vote to deny the Transfers because it was “the right thing to do” or on the basis that restarting the Facilities was a “bad” idea would not exemplify compliance. The Board of Supervisors is scheduled to hold a new hearing on the Appeals on November 4, 2025.

II. SABLE’S DUE PROCESS RIGHTS DEMAND A FAIR TRIBUNAL

When the Board performs quasi-judicial functions, such as by considering a permit transfer appeal from the Planning Commission, the Federal and California Constitutions guarantee due process of law and obligate the Board to provide a fair tribunal to the applicant. “[T]he undeniable public interest in fair hearings in the administrative adjudication arena, militate in favor of assuring that such hearings are fair.”⁷

Procedural due process thus requires that the Appeals be heard “before a reasonably impartial, noninvolved reviewer.”⁸ Public officials are “impliedly bound to exercise the powers conferred on [them] with disinterested skill, zeal and diligence and primarily for the benefit of the public.”⁹ While, the “standard for impartiality” in administrative hearings is less exacting than in judicial proceedings,¹⁰ where “concrete facts” establish “an unacceptable probability of

⁷ See *Nasha v. City of Los Angeles*. (2004) 125 Cal.App.4th 470, 483 (quoting *Nightlife Partners, Ltd. v. City of Beverly Hills* (2003) 108 Cal.App.4th 81, 90).

⁸ *Burrell, supra*, 209 Cal.App.3d at p. 581; see also *Woody’s Group, Inc., supra*, 233 Cal.App.4th at pp. 1022–23; *Nasha, supra*, 125 Cal.App.4th at 483 (quoting *Gai v. City of Selma* (1998) 68 Cal.App.4th 213, 219).

⁹ *Noble v. City of Palo Alto* (1928) 89 Cal.App. 47, 51.

¹⁰ *Nasha, supra*, 125 Cal.App.4th at p. 483.

actual bias,” by a decisionmaker, recusal is **mandatory**.¹¹ Decisions made without recusal may be vacated.¹² Put differently, an “unacceptable probability of actual bias . . . sufficient to preclude [a decisionmaker]” exists whenever a decisionmaker cannot serve as a “reasonably impartial, noninvolved reviewer[.]”¹³ “Conclusive proof of actual bias is not required.”¹⁴

A government official’s bias against a particular project precludes them from serving as an “impartial, noninvolved reviewer.” In *Nasha v. City of Los Angeles*, for example, a California court found that a planning commissioner deprived a project developer of a fair hearing as a result of the commissioner’s “unacceptable probability of actual bias.”¹⁵ There, the commissioner authored a letter calling the project a “threat to [the] wildlife corridor,” and, as a member of a local community association, had arranged for another member to speak out against the project.¹⁶ The court held that the commissioner should have recused himself because “[t]he article clearly advocated a position against the project” and “was not merely informational.”¹⁷ The court held that the failure of the decision maker to recuse himself required the planning commission’s decision to be vacated.¹⁸

Similarly, in *Petrovich Development Co., LLC v. City of Sacramento*, the court held that a developer was denied a fair hearing when a city councilmember “acted as advocate, not a neutral and impartial decision maker” by engaging in “efforts to organize opposition” to an application for a conditional use permit.¹⁹ This advocacy included providing the president of a local association opposing the project with key talking points in an effort to “coach[]” the association’s opposition.²⁰ The court held the councilmember “took affirmative steps to assist opponents of the . . . conditional use permit” and helped organize opposition at the hearing.²¹ These facts indicated the councilmember was “not a neutral and impartial decision maker” and that he “should have recused himself from voting . . .”²²

In *Clark v. City of Hermosa Beach*, the court held that the city denied a permit applicant’s right to a fair hearing because a local councilmember, who voted to overturn the planning

¹¹ *Id.* at pp. 483-84.

¹² *Id.* at p. 484.

¹³ *Ibid.*

¹⁴ *Today’s Fresh Start, Inc. v. Los Angeles County Office of Education* (2013) 57 Cal.4th 197, 216.

¹⁵ *Nasha, supra*, 125 Cal.App.4th at pp. 483-84.

¹⁶ *Id.* at p. 477.

¹⁷ *Id.* at p. 484.

¹⁸ *Ibid.*

¹⁹ *Petrovich Development Co., LLC v. City of Sacramento* (2020) 48 Cal.App.5th 963, 975-76.

²⁰ *Id.* at p. 975.

²¹ *Id.* at p. 976.

²² *Ibid.*

commission's project approval, had a personal interest in defeating the project.²³ The project, which involved construction of a 35 foot tall condominium, was poised to obstruct the ocean view from the councilmember's own property. This, coupled with the councilmember's "personal animosity" against the applicants, evidenced by repeated harassment directed toward the applicants, was sufficient evidence that the councilmember was "not a disinterested, unbiased decision maker."²⁴

Recently, in *Hermosa Fitness, LLC v. City of Hermosa Beach*, the Los Angeles County Superior Court found that a city councilmember deprived a cross-fit gym of a fair hearing during a nuisance abatement proceeding by helping residents build a record against the gym.²⁵ The court stated that the councilmember's coordination with residents opposed to the gym demonstrated that she "became an active participant in building a nuisance case against the Gym."²⁶ Even though the councilmember "may not have written an advocacy statement prior to the meeting, she performed functions of an advocate (e.g. investigation, evidence gathering) only for the complaining residents."²⁷ Because the councilmember did not recuse herself, the gym was deprived of a fair hearing.²⁸

As described below, the same approach must apply here where the evidence shows that Chair Capps has a clear record of bias against Sable and the Facilities that precludes her from acting as a "reasonably impartial, noninvolved reviewer" and from applying "disinterested skill, zeal and diligence" to the quasi-judicial evaluation of the Appeals of the Planning Commission's decision to approve the Transfers.

III. CHAIR CAPPS' RECORD OF BIAS AND LACK OF IMPARTIALITY AGAINST SABLE AND THE FACILITIES

As shown below and in the exhibits to this letter, Chair Capps is biased and incapable of impartially considering the Appeals. Chair Capps has repeatedly acted as an advocate against Applicants and against actions that she perceives as facilitating "restart" of the Pipeline, notwithstanding her obligations as a Supervisor to act in a quasi-judicial role. While the Appeals would not affect Pipeline restart or operations, Chair Capps' past statements confirm that she improperly views the Board's action on the Appeals as an opportunity to block the future operation of the Pipeline, consistent with her public animus toward the Applicants and the fossil fuel industry generally.

²³ *Clark v. City of Hermosa Beach* (1996) 48 Cal.App.4th 1152, 1173.

²⁴ *Id.* at p. 1173.

²⁵ Minute Order, *Hermosa Fitness, LLC v. City of Hermosa Beach* (Super. Ct. L.A. County, Sept. 24, 2020, No. 18STCP02840), at p. 14.

²⁶ *Id.* at p. 15.

²⁷ *Ibid.*

²⁸ *Ibid.*

For example, in a June 6, 2025, interview, Chair Capps extensively discussed her opposition both to the oil industry and specifically to actions that she viewed as potentially facilitating Pipeline restart. In the interview Chair Capps acknowledged intentionally voting against the installation of upgraded valves on the Pipeline in 2023 despite state law requiring the valves be installed: “I voted against [the Valve Upgrade Project] **because it was a way to restart the pipeline.**”²⁹ Chair Capps openly acknowledged that she disregarded the merits of the application before her, explaining that her vote was “counterintuitive” because “of course I want safety valves in a pipeline.”³⁰ Instead, Chair Capps disregarded her legal obligation to consider facts impartially while acting in a quasi-judicial capacity and voted against the application to impede the Applicants’ ability to operate the Pipeline.³¹ This is not the first time that Chair Capps has acknowledged voting on matters brought before the Board of Supervisors in a manner that is intended to block Pipeline restart—even though Pipeline restart has never been before the Board. In fact, just before the February 2025 Board hearing, Chair Capps’ District Representative and Communications Director, Eleanor Gartner, proudly proclaimed that: “Supervisor Capps has **consistently** demonstrated dedication [to climate action] principles, **having voted against proposals to restart this pipeline** during prior Board of Supervisors hearings.”³²

During the same June 2025 interview segment identified above, Chair Capps discussed her vote during the February 2025 Board hearing as part of her broader efforts to prevent Pipeline “restart.” Like her vote on the 2023 Valve Upgrade Project, Chair Capps confirmed that she will not evaluate the Applicants’ permit transfer application or the Appeals on the merits because she views the Transfers as a step toward restarting the Pipeline.³³

Chair Capps’ bias also was evident at the February 2025 Board hearing itself. She repeatedly expressed alignment with the opponents of the Transfers, stating “**this is our one shot**” and that “this is not fair to the public that this is the one shot.”³⁴ She then departed from the narrow, quasi-judicial function required by County Code Chapter 25B, stating that, “I get the tension of what we are being asked to do” by considering the Chapter 25B factors, “but **I do feel I was elected to look at the big picture and to extrapolate [] what we’re actually doing here.**”³⁵

²⁹ See June 2025 Capps Interview Transcript (Ex. 3) at p. 2 (emphasis added).

³⁰ *Ibid.*

³¹ After litigation regarding the scope of the County’s authority to prevent compliance with the state law requiring that the valves be installed along the Pipeline, the County confirmed to Sable that “it does not have permit authority or jurisdiction over the [] safety valves and their ancillary equipment as currently proposed because they are safety valves required by state law, related to the operation of an interstate [p]ipeline, and one foot or more underground.” See Letter from Errin Briggs to J. Caldwell Flores (Sep. 4, 2024), <https://content.civicplus.com/api/assets/2bc001ba-1883-4bc9-a99b-4a2e927404fb>, attached hereto as Ex. 5.

³² Daily Nexus Article (Ex. 1) at p. 2 (emphasis added).

³³ See June 2025 Capps Interview Transcript (Ex. 3) at p. 2.

³⁴ February Board Hearing Transcript (Ex. 2) at p. 18 (emphasis added).

³⁵ *Id.* at p. 20 (emphasis added).

Chair Capps also called into question the Applicants' purchase of the Facilities, calling the acquisition "fishy," and faulting the Applicants for failing to pass her subjective "smell test."³⁶ After the hearing, Chair Capps explicitly framed her decision as a vote against Sable, stating: "**Today, I voted 'no' against Sable** and voted 'yes' to public safety, environmental protections, and financial prudence."³⁷

Chair Capps has long harbored animus toward the Facilities and those operating them. Prior to the current proceedings, Chair Capps has made multiple public statements against oil production, including specifically in connection with both the ExxonMobil Interim Trucking Proposal and the Valve Upgrade Project, where she articulated opposition to local oil production and against the Facilities in particular. For example:

- In October 2014, Chair Capps posted on Twitter to complain of an "obscene amount of oil money" being spent in Santa Barbara County.³⁸
- In January 2019, Chair Capps aligned herself with anti-oil activists by stating that "we" are "against, obviously, more oil drilling."³⁹
- In May 2019, during a discussion of the ExxonMobil Interim Trucking Proposal involving the Facilities, Chair Capps explained that oil production in Santa Barbara is "the bad thing that we do" and that "[a]ll the scientists tell us it's not the right way."⁴⁰
- In February 2020, she criticized political opponents for being supported by the Pipeline's former owner, linking to an article endorsing her because—unlike those political opponents—she would "stand up *relentlessly against the fossil fuel industry*."⁴¹
- At the August 22, 2023, hearing on the Valve Upgrade Project, in which she ostensibly served in a quasi-judicial capacity, she stated that she was elected to

³⁶ *Id.* at p. 19.

³⁷ See Chair Capps' February 25, 2025, Instagram Post (Ex. 4) (emphasis added).

³⁸ See Chair Capps' October 21, 2014, Twitter Post, attached hereto as Ex. 6.

³⁹ Excerpts of "January 23, 2019 Newsmakers," NewsmakersWithJR (January 24, 2019) Transcript, attached hereto as Ex. 7 ("Jan. 2019 Newsmakers Transcript"). Video available at: <https://www.youtube.com/watch?v=kIcH7vKzdGE>.

⁴⁰ Excerpts of May 8, 2019, Newsmakers video, NewsmakersWithJR, (May 8, 2019) Transcript, attached hereto as Ex. 8 at p. 2. Video available at: <https://www.youtube.com/watch?v=lsAMb1gQYrA>.

⁴¹ Chair Capps February 19, 2020 Facebook post, attached hereto as Ex. 9 (emphasis added), available at: <https://www.facebook.com/LauraCappsSB/posts/pfbid02KSh7oSL2fpy9UqGCWKPGAnX482szdNQWkRKbgTp4YZ1c1gp3HzMgZBVq7RLHf27il>; Mary O'Gorman, "Where the Special Interests Roam", (February 19, 2020), <https://www.independent.com/2020/02/19/where-the-special-interests-roam>, attached hereto as Ex. 10.

consider “the big picture” of climate change and reliance on fossil fuels, and that the Project was “about restarting” and “putting oil back in the that pipeline,” which she could not “stand behind” so she would vote to deny.⁴²

- At the September 19, 2023, Board hearing on the 2023 Permit Transfer Appeal, she asserted that the former owner “downplay[s] risks” and stated that her mission is to “address the climate crisis and decrease our dependence on fossil fuels” adding that that “environmentalism is in our DNA.”⁴³
- On May 5, 2025, Chair Capps further aligned herself with opponents of Sable by sending an email to County staff with a link to an op-ed criticizing Sable as “a hastily-formed speculative company.” The op-ed was titled “Restarting Sable’s Pipeline Would Harm Our Communities, Environment, and Economy,” and was authored by Dr. Paasha Mahdavi—who also authored an “economic analysis” submitted to the Board by one of the Appellants, Environmental Defense Center, to *oppose* the Transfers. Chair Capps noted in her email to County staff that the op-ed was “[b]y our new friend Dr. Mahdavi.”⁴⁴

This evidence demonstrates that Chair Capps is not “reasonably impartial,”⁴⁵ and instead has a pattern of disregarding the merits of the applications before her involving the Facilities in order to vote against any action she views as potentially affecting Pipeline restart, such as the Appeals. Like during prior Board actions regarding the Pipeline, she has expressed an intent to use her “one shot” to achieve this personal political objective, rather than apply the law to the facts. Her public statements reveal a prejudgment of the issues and bias against the Applicants that are incompatible with due process and fair adjudication required in quasi-judicial proceedings. Notably, by referring to Environmental Defense Center’s consultant as “our new friend,” Chair Capps has identified herself as being coordinated with the Appellants in this matter—a far cry from being impartial.⁴⁶ Like the situation in *Clark*, Chair Capps has demonstrated a “personal animosity” to the Facilities and to the Applicants⁴⁷ and aligned herself with opponents of the Transfers as an advocate rather than acting as “a neutral impartial decisionmaker.”⁴⁸ Given this record, Chair Capps must recuse herself from participating in the Board’s consideration of the Appeals to ensure a fair and unbiased hearing.

⁴² Excerpts from the August 22, 2023, Board Hearing Transcript, attached hereto as Ex. 11.

⁴³ Excerpts from the September 19, 2023, Board Hearing Transcript, attached hereto as Ex. 12.

⁴⁴ May 8, 2025, Chair Capps email to staff members, attached hereto as Ex.13 (emphasis added).

⁴⁵ See *Nasha, supra*, 125 Cal.App.4th at p. 483; see also *Today’s Fresh Start, Inc., supra*, 57 Cal.4th at pp. 215–16.

⁴⁶ Minute Order, *Hermosa Fitness, LLC v. City of Hermosa Beach* (Super. Ct. L.A. County, Sept. 24, 2020, No. 18STCP02840), at pp. 14-15.

⁴⁷ See *Clark, supra*, 48 Cal.App.4th at p.1173.

⁴⁸ See *Petrovich, supra*, 48 Cal.App.5th at pp. 975-76.

LATHAM & WATKINS^{LLP}

IV. CONCLUSION

Applicants respectfully request that Chair Capps recuse herself from any involvement in the Board's consideration of the Appeals related to the Transfers. Her documented bias and public statements raise serious concerns about her ability to act as an impartial decision-maker. The integrity of the administrative process and the Applicants' right to a fair hearing are at stake. To uphold the principles of fairness and due process, it is essential that Chair Capps abstain from participating in the upcoming proceedings. We trust that the Board will take the necessary steps to ensure a fair and unbiased evaluation of the Appeals, in accordance with the law and the standards of good governance. Thank you for your attention to this critical matter.

Very truly yours,



Jessica Stebbins Bina
of LATHAM & WATKINS LLP

Enclosure

cc: Steve Rusch, Sable Offshore Corp.

Index of Exhibits

Exhibit No.	Description	Date
1.	The Daily Nexus, “Goleta City Council passes resolution against Sable Offshore restarting oil pipeline”	February 14, 2025
2.	Excerpts of Board of Supervisors Hearing Transcript	February 25, 2025
3.	Excerpts of “Episode 498: One on One with Laura Capps; June 6, 2025,” NewsmakersWithJR (June 6, 2025) Transcript	June 6, 2025
4.	Chair Capps’ February 25, 2025, Instagram Post	February 25, 2025
5.	Letter from Errin Briggs to J. Caldwell Flores	September 4, 2024
6.	Chair Capps’ October 21, 2014, Twitter Post	October 21, 2014
7.	Excerpts of “January 23, 2019 Newsmakers,” NewsmakersWithJR (January 24, 2019) Transcript	January 24, 2019
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9.	Chair Capps’ February 19, 2020, Facebook post	February 19, 2020
10.	Mary O’Gorman, “Where the Special Interests Roam,” (February 19, 2020)	February 19, 2020
11.	Excerpts from August 22, 2023, Board Hearing Transcript	August 22, 2023
12.	Excerpts from September 19, 2023, Board Hearing Transcript	September 19, 2023
13.	Chair Capps’ email to staff members	May 8, 2025

EXHIBIT 1

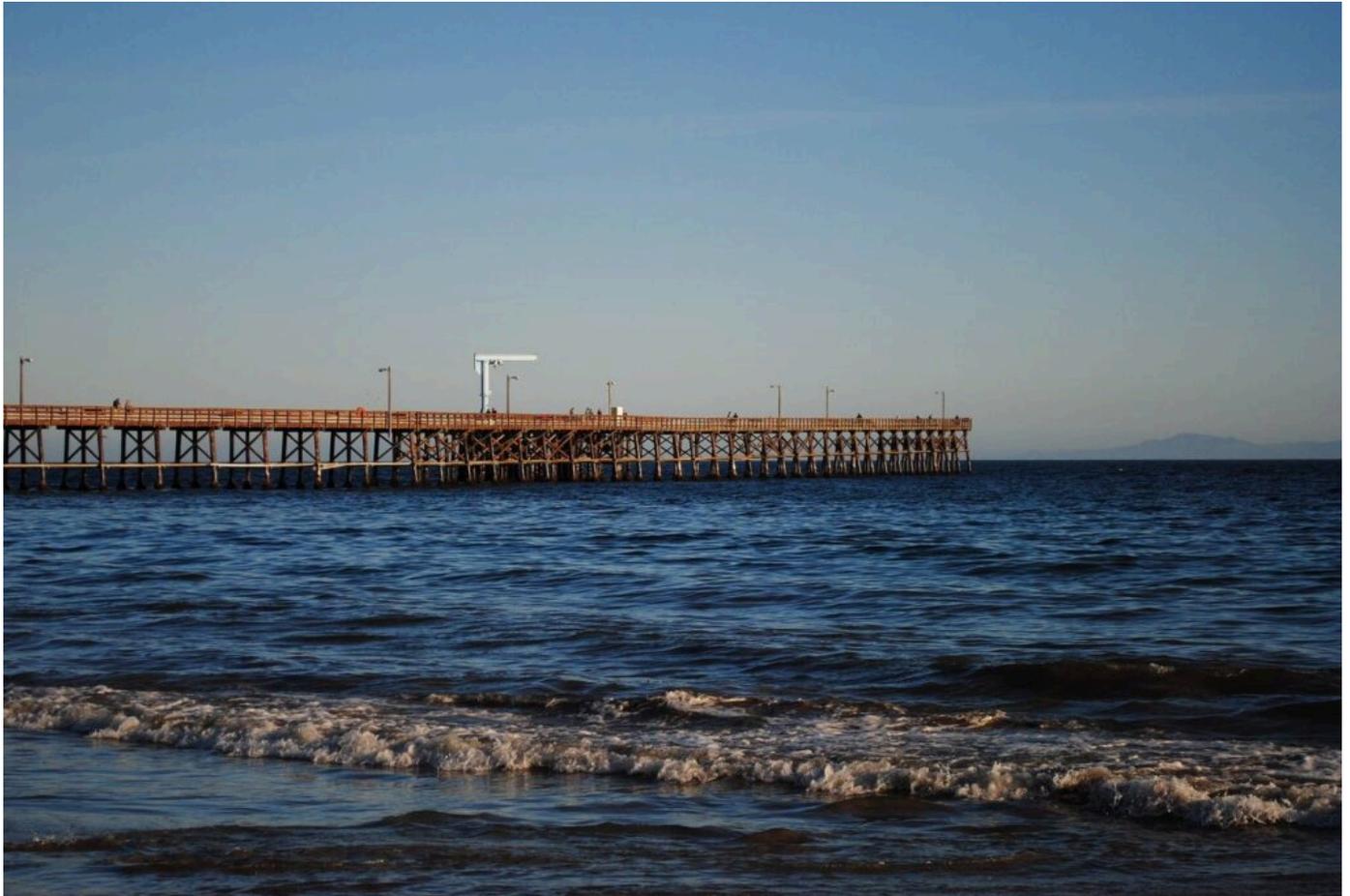
Goleta City Council passes resolution against Sable Offshore restarting oil pipeline

 dailynexus.com/2025-02-13/goleta-city-council-passes-resolution-against-sable-offshore-restarting-oil-pipeline

Michelle Cisneros

February 14, 2025

The Goleta City Council unanimously adopted a resolution on Feb. 4 opposing Sable Offshore restarting the Las Flores Pipeline responsible for the 2015 Refugio Oil Spill. The resolution has no legal ramifications but aligns with opposition from several local organizations.



Goleta City Council passed a resolution opposing Sable Offshore's pipeline restart. *Nexus File Photo*

The resolution precedes the upcoming Feb. 25 Santa Barbara County (SBC) Board of Supervisors vote to allow the pipeline's ownership transfer from oil and gas corporation ExxonMobil, who have managed the pipeline since 2022, to Sable Offshore, a new oil company.

Last October, the SBC Planning Commission [approved](#) the transfer by a 3-1 vote. Local legal nonprofits, the Environmental Defense Center and the Center for Biological Diversity, appealed the decision. Now, the SBC Board of Supervisors will make the final decision on the ownership permits.

Sable was [founded](#) in 2020 to assess the potential acquisition of the Santa Ynez Unit — the offshore platforms to extract oil and the onshore processing plants that receive oil from Las Flores.

“We don’t always go looking to wade into the matters that are decided by other jurisdictions,” City of Goleta District 2 Councilmember James Kyriaco [said](#) during the City Council meeting. “But there comes a time and there comes a moment where you have to stand up for your community and stand up for your constituents. I think this is one of those times.”

District 1 Councilmember Luz Reyes-Martín authored the [resolution](#). Local organizations such as the Santa Barbara-Ventura chapter of the grassroots environmental organization Sierra Club, student-led group UC Santa Barbara Stop Sable, Environmental Defense Center (EDC) and Center for Biological Diversity (CBD) also publicly opposed restarting the pipeline.

“The City of Goleta opposes re-commissioning the oil transport pipeline by Sable Offshore Corporation,” the resolution reads. “[The City] calls upon the County Board of Supervisors to uphold its long-standing template of opposition to the transport of oil product by truck or the Gaviota Coast pipeline.”

In 2015, the Las Flores Pipeline system ruptured near Refugio Beach, [spilling](#) over 450,000 gallons of oil — one of the largest in California history since the 1969 [spill](#) in the Santa Barbara Channel.

According to a 2024 Environmental Impact Report draft by SBC, restarting the pipeline would likely [result](#) in an oil spill every two years due to ruptures, along with a major rupture every six years due to corrosion on the pipeline.

“Santa Barbara County is the birthplace of the modern environmental movement and sustainability and climate action is core to who we are,” District Representative and Communications Director for Supervisor Laura Capps, Eleanor Gartner, said in an email statement to the Nexus. “Supervisor Capps has consistently demonstrated a dedication to these principles, having voted against proposals to restart this pipeline during prior Board of Supervisors hearings.”

The permit transfer is only one of the requirements for restarting the pipeline. Other prerequisites include a waiver from the California State Fire Marshal, which was [granted](#) in December, permits for repair work on the pipeline’s valves from the California Coastal Commission and a bond posted to the California Geologic Energy Management Division that ensures the pipeline is removed and that the land is restored if it is no longer in use.

The United States Pipeline and Hazardous Materials Safety Administration has until Feb. 15 to object or approve the California State Fire Marshal waiver, and the Coastal Commission is still estimating the decommissioning bond.

Sable Offshore, Kyriaco and Reyes-Martín did not respond to requests for comment.

The Nexus will continue to report on this topic as more information becomes available.

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Print



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Comments are closed.

EXHIBIT 2

1 [00:05:00]

2 [00:10:00]

3 [00:15:00]

4 [00:20:00]

5 [00:25:00]

6 CHAIR CAPS: Oh, good job, everybody. Nice to see everyone here.

7 My name is Laura Caps, and it's my pleasure to call to order the

8 February 25th 2025 meeting of the Santa Barbara County Board of

9 Supervisors hearing. Madam Clerk, please call the role.

10 CLERK: Supervisor Lee.

11 MR. LEE: Here.

12 CLERK: Supervisor Hartman.

13 MS. HARTMAN: Here.

14 CLERK: Supervisor Nelson?

15 CLERK: And Supervisor Nelson's participating remotely from DC.

16 MR. NELSON: Here.

17 CHAIR CAPS: Oh, there you are. Great, thank you, and Supervisor

18 [PH 00:29:24] Lavanino.

19 MR. LAVAGNINO: Here.

20 CLERK: And Chair Caps?

21 CHAIR CAPS: Here.

22 CLERK: At this time, please, join me in Pledge of Allegiance.

23 Ready to begin.

24

25

1 great Donald Trump as President, and he is the greatest President we
2 have ever seen, we're going to see that also in our county. We are
3 part of the country. We're not our own little

4 [00:55:00]

5 planet out in the middle of the ocean. We are part of the United
6 States. Thank you.

7 CLERK: And has any of the members of the public whose names I
8 had announced earlier make their way here? Jacqueline Inda, Stephanie
9 Caterers, Hailey Rowan, Ruth Hyler, are any of those members of the
10 public here? I will assume they have... oh.

11 HAILEY ROWAN: This is Hailey Rowan, and I'd like to speak on the
12 Sable topic as well. Thank you.

13 CLERK: Thank you. All righty, with that, Chair Caps and members
14 of the board, I believe we can safely assume those members of the
15 public have left or will be speaking at a later time.

16 CHAIR CAPS: Thank you to our public, and it's confusing to know
17 exactly when is the right time to speak. So, we got through that. So,
18 anyway, now, that moves us to item number one, Sable Offshore
19 Corporation Appeals. Madam Clerk, will you please read departmental
20 item into the record and... Supervisor Hartman?

21
22 MS. HARTMAN: Yeah, before she does that, I must recuse the
23 pipeline runs through the northeast corner of my property. So, I am
24 affected differently than the general members of the public and can't
25 influence my fellow board members.

1 CHAIR CAPS: Yeah. I understand, thanks.

2 CLERK: I'm waiting on something. Chair Caps and members of the
3 board, departmental item number one is from the Planning and
4 Development Department. It is a hearing to consider recommendations
5 regarding the appeals of the planning commission approval of the Sable
6 Offshore Corporation's change of owner operator and guarantor for the
7 Santa Ynez Unit, Pacific Offshore Pipeline Company Gas Plant and Los
8 Flores Pipeline System, final development plan permits, and this is in
9 the third, fourth, and fifth districts, and I am waiting for a document
10 from my staff on late items that need to be voted into the record. We
11 had quite a few emails come in late last night. So, they are
12 finalizing that. So, perhaps we can begin staff's presentation, and
13 then vote items into the record.

14 CHAIR CAPS: Or ex parte?

15 CLERK: Or ex parte. Great, thank you.

16 CHAIR CAPS: Yeah, let's... would you like? Okay, at this moment,
17 because this is a quasi-judicial hearing, that means myself and my
18 colleagues need to disclose ex parte conversations that we've had
19 leading up until this department item. Supervisor Lee, would you like
20 to go first?

21 MR. LEE: Thank you, Chair Caps, I'll go first. On January 28th,
22 2025, I met with the EDC to discuss Sable. On February 6th, 2025, I
23 also met with EDC to discuss Sable as well. On February 12th, I met
24 with Sable representatives to talk about the oil pipeline. On February
25 20th, I met with Sierra Club to talk about Sable, and on February 20th,

1 if it's over a page. There's only four members participating today.
2 So, it would require all four votes, and so, as a two-two, the board
3 has taken no action on these items.

4 CHAIR CAPS: Okay, thank you. We will move on then to staff's
5 presentation.

6 MR. NELSON: Actually, Chair Caps?

7 CHAIR CAPS: Yes, Supervisor Nelson?

8 MR. NELSON: Yeah. So, I'm okay with where the vote went there,
9 but I do think this should be a message to all those out there in the
10 county that this is something the board may not be doing in the future.
11 Like I said, I voted for it in part because we do this by tradition
12 typically. If we're now going to set us new standard, I'm happy in the
13 future to also vote against these moving forward from this day on, and
14 I'm making sure that, any of those out there watching, that I'm going
15 to look at these a lot more skeptically in the future as well to go
16 with being the board's majority on this in the future.

17 CHAIR CAPS: Excellent. Yeah, Supervisor Lavanino?

18 MR. LAVAGNINO: I totally agree. I will not be making any
19 exceptions from here on out for anybody. So, it's what it is. We all
20 agree.

21 CHAIR CAPS: There we go. So, split vote, but unanimously, we
22 all agree on the fact that this is... we're moving forward with a new
23 plan here. So, okay. With that, I'm going to... we are going to close
24 public comment. I think we have close to 80 if not more. At this
25 point. 122. Okay. So, remember what I said about those who want to

1 do a minute. Be thinking about your comments, and if you'd like to
2 move things along, you're welcome to be editing in your mind to come
3 down and be towards the beginning. Okay. With that, we'll move it
4 over to staff presentation.

5 DIRECTOR PLOWMAN: Good morning, Madam Chair, members of the
6 board. Today, we have the appeal of the planning commission approval
7 of the Sable Offshore Corporation's change of owner operator and
8 guarantor for the Santa Ynez Unit, the Pacific Offshore Pipeline
9 Company Gas Plant, and the Los Flores Pipeline system. We have Aaron
10 Briggs, who's the deputy director of our Energy Minerals and Compliance
11 Division here to present, as well as Jacqueline Ibarra, who has been
12 the planner on this case, and with that, I'm going to turn it over to
13 Ms. Ibarra, and she can make the presentation.

14 MS. IBARRA: Okay. Good morning. Good morning, chair. Good
15 morning, supervisors and members of the public. As Director Plowman
16 mentioned, today, the board is considering the appeals of the county
17 permit transfers to Sable Offshore Corporation for a change of owner
18 operator and guarantor of the San Nunes Unit, the Pacific Offshore
19 Pipeline Company, or POPCO Gas Plant, and the Los Flores pipeline
20 system. You're going to hear a lot of information today. So, my goal
21 with staff's presentation is to keep it fairly high-level and concise,
22 knowing that there are 13 detailed appeal issues. So, please, bear
23 with me as we get through them all. Since there are multiple parties
24 involved, I wanted to introduce who's who. The energy division has
25 been processing these cases. I'm the staff planner, Jacqueline Ibarra,

1 and Deputy Director Briggs is with me today. The applicant is Sable
2 Offshore Corporation, and the appellants consist of two groups: first,
3 the Center of Biological Diversity, together with the [INDISCERNIBLE
4 01:09:39] Foundation, and secondly, the Environmental Defense Center,
5 together with Get Oil Out and the Santa Barbara County Action Network.
6 The applicant's request is to consider the following county transfer
7 permits for: one, a change of owner operator and guarantor of the San
8 Nunes Unit from Exxon Mobil

9 [01:10:00]

10 to Sable, two, a change of operator and guarantor of the POPCO
11 plant permit from Exxon to Sable, and three, for a change of operator
12 of the Los Flores Pipeline Systems permit from ExxonMobil Pipeline
13 Company and a change of guarantor from Exxon to Sable. Under these
14 requests, POPCO remains the legal owner of the gas plant, and Pacific
15 Pipeline Company remains the legal owner of the pipeline system.

16 Important to note, these requests are to transfer the county permits
17 for the individual assets and not the underlying assets themselves.

18 Also, these transfers do not include authorization for restart of the
19 facilities or any work or continued operations. This slide shows the
20 facility locations. On the left are the SYU facilities, outlined in
21 white, which are located in the Los Flores Canyon along the Gaviota
22 Coast. The gas plant is a very small portion of that area located in
23 about the middle of the canyon. On the right shows the Los Flores
24 Pipeline system. It stretches 122 linear miles, starting at the Los
25 Flores Canyon and ending in Kern County. A bit of background on the

1 facilities and permit transfers. The SYU treats oil and gas produced
2 from offshore platforms Hondo, Harmony, and Heritage. Oil is normally
3 transported via the Common Carrier Los Flores Pipeline system. A
4 pipeline spill in 2015 under Plains All American, a separate company,
5 caused the pipelines and facilities to shut in. However, activities
6 still occur to maintain facility integrity. Pacific Pipeline Company
7 acquired the system in 2022, and your board approved that permit
8 transfer in 2023. Sable acquired these assets in February of 2024,
9 submitted applications to the county in March of that year, and the
10 planning commission approved them on October 30th. Appeals were
11 submitted in November, and now, were before the board in accordance
12 with Chapter 25 B, which governs the process to transfer these permits.
13 This slide quickly covers environmental review and code consistency for
14 the requests. So, under CQA, the permit transfers do not constitute a
15 project, as they don't result in the direct or indirect physical
16 changes to the environment. For code consistency, this table outlines
17 what 25B requires for each: a change of owner, operator, and guarantor.
18 It's limited to nine findings, which are summarized in the left-hand
19 column. Okay, getting into appeal issues. The first few are related
20 to financial guarantee findings that require all facility fees to be
21 paid, and that any existing financial documents are updated to reflect
22 the new permittee. Under appeal issue number one, the appellant state
23 that Sable must be issued final certificates of financial
24 responsibility for the SYU, or San Nunes Unit. That's a state document
25 issued by the California Office of Spill Prevention and Response, OSPR.

1 The appellants also state that the county must require these
2 certificates for the pipeline system as well. In response, only the
3 SYU permit requires financial documents to be submitted to the county,
4 which are limited to SYU's offshore certificate of financial
5 responsibility. We confirmed that OSPR issued Sable a certificate in
6 October of last year, which demonstrates their financial responsibility
7 of \$101 million. That's based on state regulations, and it's not based
8 on the approval of any associated oil spill contingency plan. The
9 pipeline permit nor the POPCO permit requires sable to submit any
10 financial documents, and the county cannot require documents where they
11 are not already required. Finally, not related to the board's
12 findings, but for information only, OSPR also issued certificates for
13 the pipeline system. Those are under state requirements. So, we know
14 that they exist. They're just not required for the county's permit
15 transfer. For appeal issue number two, the appellants state that Sable
16 must pose decommissioning bonds prior to the permit transfer, as
17 required by county permits and state law. In response, the findings
18 require existing bonds to be updated. However, there are no current
19 bonds in place. The permit conditions state that decommissioning bonds
20 will be posted to the county at final facility abandonment. For the
21 SYU and pipeline system, the permit conditions state that the county
22 will determine if bonds are required or if the permittee shall continue
23 to pay property

24 [01:15:00]

1 taxes through final abandonment. For state bonding requirements,
2 the county has no jurisdiction over that process, and it's not required
3 for the county permit transfers. For appeal issue number three, the
4 appellants state that Sable does not have enough insurance to cover a
5 worst-case oil spill from the facilities. So, in response, similar to
6 issue number one, only the SYU permit requires financial documents to
7 be submitted. However, the permit does detail that insurance
8 certificates are only required for users of marine terminals, which is
9 no longer applicable for the SYU, and therefore, not required for the
10 permit transfer. Outside of the board's consideration and for
11 information only, Sable also previously provided certificates of both
12 their property insurance and their liability insurance. So, again, we
13 know that they exist and are in place but are not required for the
14 county's permit transfer. For appeal Issue number four, the appellant
15 state that if Sable cannot remediate oil spills or pay for
16 decommissioning costs. The county and its taxpayers would be
17 responsible. In response, the financial findings of 25B are limited to
18 what's outlined in the code, and those findings have been met through
19 the submittal of the SYU Certificate of Financial Responsibility. In
20 addition, county code and the permits clearly outline that abandonment
21 and liability responsibilities for the permittee. Any failure to comply
22 with the permit or code would be subject to fines and penalties.
23 Outside of the board's consideration, for information only, Sable will
24 also post upwards of a \$500 million bond with Exxon for those
25 abandonment responsibilities, and there are other state and federal

1 regulatory protections in place for offshore decommissioning and oil
2 spills if they were to occur. Now, we're moving on to chapter 25B,
3 findings related to compliance with the existing permits. So, this
4 finding requires that the permittee be in compliance with the permit as
5 of the date of application completeness, which was July 30th of last
6 year. So, under appeal issue number five, the appellants state that
7 Sable is not in compliance with the pipeline permit, specifically
8 condition A7, that state that they state requires effective cathodic
9 protection. In response, the permit itself does not list any
10 conditions specific to the [PH 01:17:43] cathodic protection system or
11 its effectiveness. Condition A7 has standard permit language that
12 states that the project description that received environmental review
13 is required as elements of the project. So, the pipeline's
14 environmental document outlines the cathodic protection requirements.
15 It's limited to descriptions of a certain equipment type and location.
16 It also outlines that insulated coating would also be applied to the
17 pipeline in addition to the cathodic protection system. The pipeline
18 does use I'm pressed current cathodic protection, which meets the
19 description outlined in the environmental document and summarized in
20 the check marks here. For appeal issue six, we move on to findings
21 that require all county compliance plans be updated with the new
22 operator's emergency contact information. The appellants state that
23 Sable has not submitted final approved oil spill contingency plans from
24 OSPR, and therefore, the county findings can't be made. In response,
25 we confirmed that all compliance plans were submitted with the required

1 information back in August of last year. 25B does not require these
2 plans be approved by non-county regulators. Outside of the board's
3 consideration, and for information only, BSEE approved the SYU
4 contingency plan in June of last year, and that plan is currently in
5 review by OSPR. It might already be approved. Sable can speak to
6 that, and similarly, OSPR also reviewing the pipeline's contingency
7 plan. These plans are really considered living documents. They're
8 routinely updated, and they're considered effective upon submittal,
9 which means that Sable is mandated to follow the most current version
10 of the plan in the event of an oil spill or upset event. The next two
11 issues relate to operator capability findings, which requires the
12 operator to demonstrate the skills, training, and resources to comply
13 with county permits and county code. So, under appeal issue number
14 seven, the appellants state

15 [01:20:00]

16 that Sable has not demonstrated enough capital to restart and
17 operate the facilities. In response, this finding really focuses on
18 the operator's technical skills and safety records, not financial
19 resources. Those specific financial requirements are outlined in
20 separate findings, as we've discussed in appeal issues one through
21 four, and as detailed in the board's record, we determined that the
22 operator does have sufficient technical skills, training, and safety
23 records that show their ability to comply with county permits and
24 county code. Outside of the board's consideration, and for information
25 only, Sable does have the capital to restart and is currently worth

1 \$2.5 billion, and margins will increase once production restarts and
2 oil goes to sale. For appeal issue eight,, the appellants state that
3 Sable has recently been issued various violations for the pipeline
4 system, demonstrating that they cannot operate in compliance with state
5 permits and regulations. In response, the finding requires that the
6 operator does not have a record of systemic non-compliance or unsafe
7 operations related to major incidences for similar facilities. The
8 county defines a major incident as either an oil spill entering the
9 environment, a serious injury or fatality to a member of the public,
10 major facility evacuations, or major facility fires. We confirmed that
11 Sable's previously operated companies, including those within the
12 county of Santa Barbara, operated with zero major incidences,
13 confirming a sufficient safety record. Chapter 25B does not require
14 current compliance with non-county permits or non-county regulations to
15 approve this permit transfer. Outside of the board's consideration,
16 and for information only, Sable has and is implementing safety measures
17 on the pipeline, including installation of valves and conducting
18 inspections and repairs. State agencies have issued violation notices
19 for that work, and it's our understanding that Sable is in ongoing
20 communications to resolve those potential violations. However, again,
21 those are under state required permits and regulations, not county
22 ones, and those activities do not reflect systemically unsafe
23 operations related to major incidences. The last group of appeal
24 issues isn't connected to any specific 25B findings. So, I grouped
25 these in as other. Under appeal issue number nine, the appellants

1 state that environmental review should be conducted for both the permit
2 transfers and for the restart of the facilities. In response, as I
3 mentioned earlier, the permit transfers are not considered a project
4 under CEQA. They are an administrative process that wouldn't result in
5 any physical changes to the facilities. Restart is not part of the
6 permit transfer process, as the facilities are already permitted to
7 operate under their individual county permits. An environmental review
8 was previously conducted for these operations prior to original project
9 approvals. For appeal issue ten, the appellants state that restarting
10 the pipeline could result in an oil spill every one to four years, and
11 that Sable intends to restart without correcting any issues. In
12 response, the permit transfers are limited to the board's ability to
13 make the required findings of chapter 25B, and chapter 25B only.
14 Outside of the board's consideration, and for information only, that
15 spill data that the appellant site is from an incomplete administrative
16 draft document prepared for a separate project. That data was based on
17 national pipeline failure rates and was increased five times to reflect
18 a rate of failure for pipelines not equipped with cathodic protection.
19 In reality, the pipeline is equipped with cathodic protection, and
20 Sable is required to meet a host of safety conditions prior to restart,
21 some of which are listed here, and a reminder that the county has no
22 authority to oversee those state and federal restart requirements. For
23 appeal issue 11, the appellants state that planned and ongoing
24 modifications to facilities would require new or revised county
25 permits. In response, the permit conditions do have standard language

1 would assume then county counsel reviewed it and realized maybe there
2 were parts of it that possibly were illegal. A woman asked today, and
3 I think she summed up the thoughts of so many today, was she's asking
4 us, rhetorically, do you stand with the people, or do you stand with
5 big business, and in my mind, I realized that's when I came to the
6 conclusion that I'm not on either side. We have to stand by the law.
7 This pipeline was legally permitted, and as we heard, and in any other
8 county, this change of ownership would've been a simple checklist
9 signed off by the Fire Department. So, the reason why you're here
10 today and so passionate is because the actual regulating agencies that
11 have jurisdiction have basically ducked their responsibilities, and
12 they will not hold a public meeting and let you have... vent your
13 frustrations. So, unless there's an organization that I'm waiting for
14 that wants to step up and indemnify the county against the lawsuit, I
15 will be absolutely supporting the planning commission and our staff
16 recommendation.

17 CHAIR CAPS: Thank you, supervisor Lavanino. Supervisor Lee?

18 MR. LEE: Thank you. Thank you, chair. When I came in this
19 morning, around 7:00, I saw hundreds of people were outside. So, I
20 want to say thank you for being patient and being here and sitting
21 through this. My takeaway of all this is: we have a pipeline that
22 leaked in 2015, that devastated our environment, our coastline,
23 economy, and killed so many wildlife, and we want to restart it. To
24 me, that's an insane idea. That's a very bad idea, but yet, we are
25 having this conversation right now. After considering listening to the

1 appellant and Sable and listening to the public, and I came to conclude
2 that I support upholding the appeals, because that's the right thing to
3 do, and that's where I'm at. Thanks.

4 CHAIR CAPS: Thank you, Supervisor Lee. Supervisor Nelson, would
5 you like to go next?

6 MR. NELSON: Yeah, thank you. Thank you, Chair Caps. I
7 appreciate the opportunity, and I want to thank the public too, and I
8 just want to let sure everybody in the room understands that I have
9 this meeting in Washington DC on behalf of the county scheduled before
10 this hearing. I would've loved to be there in person, and I wanted to
11 thank all the staff and my colleagues and the public for braving a long
12 day that's not quite over yet. The first point that I wanted to make...
13 to focus in on was the idea of this sometime legislative intent for Mr.
14 Day. You know, legislative intent doesn't go down to the staff member
15 that writes the ordinance. It's the first draft that goes to the
16 board, and the board deliberates, and then we give board legal
17 opinions, and then we talk among each other, and then we, as a body,
18 elected body by the citizens or the voters of Sambar County, we're the
19 ones that have the legislative intent there. So, you know, that whole
20 issue there and from Mr. Day, you know, just didn't hold water for me
21 on what 25B is maybe supposed to mean, or what it was intended to mean.

22 [07:15:00]

23 The other issue that I have, I'm concerned about is the Coastal
24 Commission. I think we all in the room don't always agree with
25 agencies. You know, I might disagree with the state agency. I'm sure

1 there's people in the room that might be disagreeing with some federal
2 agencies, and sometimes, they get it wrong, and I think that this is
3 the case here, both Coastal Commission, and I think if they truly
4 believe that they needed a permit, that they would've taken Sable to
5 court by now to stop, get a stay in place, but I do think this has
6 gotten political. It's not the first time the Coastal Commission's
7 gotten political. They got politically recently with Vandenberg Space
8 Force Base, and this is unfortunately another black eye. I feel bad
9 for most of the speakers who have been here, and they were told that
10 today, well, that the decision will impact the restart. I have to bury
11 the lead. It won't. No matter what happens here, the decision here
12 won't make that difference. This is political theater, and in some
13 cases, gaslighting. It's asking me to think that many of the young
14 people that showed up will believe that their government doesn't care
15 or didn't listen to them. This is about politics, not the environment.
16 This is about the dislike of oil, not law and science. If it was
17 really about the environment, we would've seen people come out in
18 droves a year ago when we had untreated sewage, ten times the amount of
19 the Refugio oil spill, spill into the Pacific Ocean, and it barely made
20 a week's worth of news. This is about oil. The appellants don't care
21 about the liability. This is subterfuge. They opposed the trucking.
22 They opposed a new pipeline, they even opposed safety valves, and now,
23 they're opposing the transfer of a name on a permit. They will stop at
24 nothing for the restart of the oil operations, and for me, that sounds
25 a lot more like religion and politics than law and science. For me,

1 I'm compelled by the engineers and the scientists and the legal experts
2 at the county, at the state, and the federal government, and I will
3 support the [PH 07:17:09] PC and the staff recommendations to deny the
4 appeal and approve the transfer of the permit.

5 CHAIR CAPS: Okay, thank you. Like Supervisor Lavanino, I was a
6 little kid after the oil spill of 1969, and it's actually the reason
7 why I went into a world of politics and advocacy. It was the first
8 issue that really struck me. My parents were very engaged, would take
9 me to early rallies, early days of Goo, and all of the activism that
10 sprouted up, and obviously, the birth birthplace of Earth Day. So, I
11 just have to say that I really appreciate how everyone's hung in here
12 today in such, again, such a conducive, collaborative way of respect.
13 I mean, this was a marathon, and I have to say too, I'm so proud of
14 UCSB and our gauchos for showing up in such force. I had no idea. I
15 mean, I shouldn't be surprised, but they just one after one after one
16 really putting your future where your heart is by speaking so
17 eloquently, and by being here and being so dedicated. So, thank you.
18 It's an honor to represent you. It really is, and it has been stated.

19 This is our one shot. I agree. I do agree with my colleagues, even
20 though I'm not going to vote with them, this is not fair to the public
21 that this is the one shot that you've all had here in Santa Barbara,
22 where we experienced a devastating spill in 2015, and this is what you
23 get, a technicality on a permit change for a hearing, because there's
24 so many layers. It's designed to be completely confusing. It's
25 designed to be completely in favor of big interests, big, powerful

1 interests with lobbyists and influence, so that we don't know why
2 things are being decided the way they are. We don't know why things
3 are not moving forward. This was this one chance, and it's extremely...
4 I agree with you. It shouldn't be... it's not fair for some folks to
5 walk out of here and think, okay, we stopped the pipeline, or we
6 started the pipeline. That is not what we're doing here, and that is
7 completely unfair. But there are too... so, even within the narrow
8 confines of what we're actually doing here, there are too many red
9 flags, because we are, this is about fiscal oversight, and we do sit up
10 here with a fiscal responsibility of a budget of \$1.6 billion annually,
11 and to me, it's too risky to have an applicant that was formed when a
12 major company decided that having this pipeline was potentially too
13 risky. So, then it's just too, it's just... as I said earlier, it's
14 fishy to me

15 [07:20:00]

16 that you would sell a pipeline to a new company that doesn't have
17 the funds for it, and again, maybe this is extremely common, but it
18 doesn't pass my smell test, and then loan them the money. If they had
19 wanted to show the insurance policy, they could have, and so much has
20 been made over the last several months about this policy. Why not just
21 show it? Why not just go above and beyond the checklist? That is
22 another red flag for me. Compliance with the Coastal Commission is
23 another red flag for me. Why have a cease and desist? Why not just
24 cooperate with this governing body? So, really, what we're looking at
25 is fiscal stability. That's what we're charged with trying to do, and

1 there are far too many flags. It was said by Mr. Day, in his
2 interpretation of the ordinance that he wrote, that it's a gamble.
3 This was not meant to be toothless. Our job, I get the tension of what
4 we're being asked to do, but I do feel I was elected to look at the big
5 picture and to extrapolate of what we're actually doing here, and I
6 cannot, in good faith, say that this transfer gives me reassurance of
7 fiscal stability. So, I will be voting to uphold the appeal. So,
8 let's do a roll call vote. A motion. So, I would need a motion from
9 somebody.

10 MR. LAVAGNINO: Well, this is going to be weird.

11 CHAIR CAPS: We can just do two.

12 MR. LAVAGNINO: Yeah. Okay. Why don't you guys do your
13 questions?

14 CHAIR CAPS: Wait, well, I'll go [INDISCERNIBLE 07:21:37].

15 MR. LAVAGNINO: Yeah, because I'm trying to find the language.

16 CHAIR CAPS: I could make a motion. Thank you. We have our
17 most...

18 MR. LAVAGNINO: Yes. All right, I will move staff
19 recommendations A through D.

20 MR. NELSON: I will second that motion.

21 CHAIR CAPS: So, then, Madam Clerk, when you're ready, we'll do a
22 roll call vote.

23 MR. LAVAGNINO: Pins and needles.

24 CLERK: Supervisor Lee?

25 MR. LEE: No.

EXHIBIT 3

June 6, 2025, Newsmakers withJR, (June 6, 2025)

Latham & Watkins

October 17, 2025

Transcript by TransPerfect

[00:12:15]

JERRY ROBERTS: And then you mentioned the two-two vote. Now, this was, as you say, a name change basically to approve the movement of assets from Exxon to this corporation that didn't exist a few years ago, called Sable. It was a two-two vote at the Board of Supervisors. It was a three-one vote on the oil company's behalf at the Planning Commission, and they're saying, because it was a tie vote, this is like trying to explain the infield fly rule to somebody--

SUPERVISOR LAURA CAPPS: I know. You just lost--

[OVERLAY]

SUPERVISOR LAURA CAPPS: -- everybody again, but that's okay.

JERRY ROBERTS: But you're getting sued on this?

SUPERVISOR LAURA CAPPS: We are currently getting sued about what is that two-two vote. So, a judge will decide if this goes -- the lawsuit is, what does the two-two vote mean?

JERRY ROBERTS: Right. And from your perspective, the two-two vote, you were two, no, we shouldn't allow--

SUPERVISOR LAURA CAPPS: Yeah.

JERRY ROBERTS: -- the transfer of assets? That would be the favorable outcome?

SUPERVISOR LAURA CAPPS: Yeah, we had this marathon hearing. I raised a lot of concerns about the financial stability of this company that basically Exxon sold the pipeline to, but they didn't have any money to buy it. So, Exxon gave them money to buy it, and then they bought it. They've never operated a pipeline before and currently don't. So, I raised a lot of red flags about transferring it to Sable, and Roy Lee joined me in voting against being able to give it to Sable. So, it was a two-two vote, and that's now the subject of one of many lawsuits happening.

JERRY ROBERTS: Yeah, I got to say. The thing that really concerns me in this whole story is that same -- I mean, it all goes back to Trump, but, I mean, Trump pays no heed to court decisions, particularly, unless he happens to agree with them, or other authorities or anything else. And this oil company is behaving like that. They don't have to pay any taxes to the Coastal Commission. The Coastal Commission has restraining orders on them up the wazoo. They got an 18-- they don't care. And every time that there's another court decision against them, they say, it doesn't bother us at all. And I know you probably can't talk about this much, but there's this original decision at County Council that the permit that was granted to Exxon for the pipeline originally back before the last Ice Age, whenever it was --19--

SUPERVISOR LAURA CAPPS: 1986, I think.

June 6, 2025, Newsmakers with JR, (June 6, 2025)

Latham & Watkins

October 17, 2025

Transcript by TransPerfect

JERRY ROBERTS: It was close. Takes precedent over all else.

[00:15:00]

They don't really need a permit. So, every time the Coastal Commission tries to enforce something on them, they just kind of wave around this County Council thing and say, we don't have to do it. I mean, can you say anything about that? I mean, it's really kind of put you in a bind.

SUPERVISOR LAURA CAPP: Yeah. Again, it's been really unclear in a lot of different interpretations. And what I try to focus on is what's before me. I've raised a lot of questions in the hearings that we've had. I voted against putting valves last year, which, again, is counterintuitive. Of course I want safety valves in a pipeline. It's state law passed by then-Assembly Member Das Williams. But I voted against putting in the valves because it was a way to restart the pipeline. But, yeah, I think, because, in part, it's just been very confusing, and very murky, and hard for even those who are decision makers in this to sort of understand what the next steps are. But hats off to EDC and others for really -- and the Independent, too, for helping to explain this and the attention. I mean, the public awareness, the fact that, that hearing, we had 700 people, we had the longest public comment in our county history. It went on for four-plus hours. It was 138 speakers, I mean, all these speakers, too, from UCSB. So, I don't know where this will go, but no matter what, it's really galvanized the county and the people. And I think that brings me to what I'm hoping we can talk about, is the vote that I do understand where we are, which is banning.

I hereby certify that “June 6, 2025, Newsmakers withJR, (June 6, 2025)” is, to the best of my knowledge and belief, a true and accurate transcription from English to English. The transcript represents the media retrieved from <https://www.youtube.com/watch?v=u4gmxCnZvDM> from 12:15 to 16:48.of its running time.

Anders Nelson

Anders Nelson (Oct 17, 2025 13:45:19 EDT)

Anders Nelson
Project Manager
TransPerfect Legal Solutions

October 17, 2025

EXHIBIT 4



supervisorlauracapps • [Follow](#)



Santa Barbara County



supervisorlauracapps 33w

Today, I voted "no" against Sable and voted "yes" to public safety, environmental protections, and financial prudence. It's too big a gamble for the county to simply check the box of a permit transfer, disregard all the alarming red flags the community and environmental advocates have rightfully raised, and put the county and the public in jeopardy of holding the bag when there is another spill.



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February 25

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More posts from supervisorlauracapps

EXHIBIT 5



Planning and Development

Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

September 4, 2024

VIA EMAIL

J. Caldwell Flores
President
Pacific Pipeline Company
845 Texas Ave. Suite 2920
Houston, TX 77002

Mr. Flores,

Santa Barbara County Department of Planning and Development has received your August 30, 2024 notice regarding Pacific Pipeline Company's ("PPC") revisions to the sixteen (16) safety valves and their ancillary equipment for MOV1-210P, MOV1-220P, MOV1-610P, CHK1-710P, MOV1-790P, MOV1-890P, MOV1-990P, CHK2-610P, MOV2-690P, MOV2-1010P, CHK2-1110P, MOV2-1190P, MOV2-1290P, CHK3-210P, MOV3-290P, and CHK3-490P.

The Settlement Agreement in *Celeron Pipeline Company of California v. County of Santa Barbara* (Case No. CV 87-02188) ("Celeron Agreement") documented that federal law preempts the County in the field of pipeline safety regulation and safety oversight as it relates to the Las Flores Pipeline System ("Pipeline") The Celeron Agreement presumes the County is preempted when the activity to be performed is one foot or more below the surface of the ground and related to the design, construction, or operation of an interstate pipeline.

Under the Celeron Agreement and federal law, the County recognizes it has limited jurisdiction to require a permit to operate the Pipeline unless the Final Development Plan Conditions specifically set forth that jurisdiction. The County confirms it does not have permit authority or jurisdiction over the sixteen (16) safety valves and their ancillary equipment as currently proposed because they are safety valves required by state law, related to the operation of an interstate Pipeline, and one foot or more underground. We understand the Pipeline remains subject to regulation by the Office of State Fire Marshal and that you will be working closely with that office on installation and testing of the safety valves, as well as implementing a number of integrity-related improvements required by that office.



This is not a permit exemption nor a Director decision on the meaning or applicability of the provisions of the County's Zoning Ordinances. This letter serves to respond to your request to acknowledge existing preemption under federal law and the Celeron Agreement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Errin Briggs". The signature is fluid and cursive, with the first name "Errin" and the last name "Briggs" clearly distinguishable.

Errin Briggs
Deputy Director, Energy Minerals & Compliance Division
Planning & Development
County of Santa Barbara

EXHIBIT 6



← **Post**

laura capps

@lauracappssb



obscene amount of oil money being spent here in Santa Barbara to defeat a Fracking measure wapo.st/1tJa5D5

1:15 PM · Oct 21, 2014



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EXHIBIT 7

January 23, 2019 Newsmakers, NewsmakersWithJR (January 24, 2019)

Latham & Watkins

October 17, 2025

Transcript by TransPerfect

[00:05:17]

JERRY ROBERTS: Is this steam extraction process -- is this something that's on the no-go list of the environmental movement?

SUPERVISOR LAURA CAPPS: Yeah, because it's a one-two punch. Not only are we against, obviously, more oil drilling, but the way in which you get this oil, because it's really hard to extract, is also very carbon-intensive and uses a ton of water. So, it's like the method is also a threat to climate. And so, that's why you see such opposition and such mobilization.

JERRY ROBERTS: And who has to approve it, the Supes?

I hereby certify that “January 23, 2019 Newsmakers, NewsmakersWithJR (January 24, 2019)” is, to the best of my knowledge and belief, a true and accurate transcription from English to English. The transcript represents the media retrieved from <https://www.youtube.com/watch?v=kIcH7vKzdGE> from 00:05:17 to 00:05:50 of its running time.

Anders Nelson

Anders Nelson (Oct 17, 2025 13:43:27 EDT)

Anders Nelson
Project Manager
TransPerfect Legal Solutions

October 17, 2025

EXHIBIT 8

May 8, 2019 Newsmakers video, NewsmakersWithJR, (May 8, 2019)

Latham & Watkins

October 17, 2025

Transcript by TransPerfect

[00:10:44]

TYLER HAYDEN: They're not pulling up oil and sending it north. So, this permit would allow Exxon to dispatch 70 trucks working 24 hours a day, [PH 00:10:53] 70 days a week to pick up the oil that would come from the platforms, that would go to the Las Flores facility and then, while the pipeline is being replaced, truck it instead to refineries.

JERRY ROBERTS: That sounds safe. No?

SUPERVISOR LAURA CAPP: Yeah, just trucks full of oil on the busy highways, great plan.

JERRY ROBERTS: B the Supes also get a lot of pressure from this because these are good jobs. How many jobs --?

TYLER HAYDEN: There's a few hundred good paying jobs that were lost after the spill, not completely loss. Some, rather. Some people were laid off. Others had been transferred to other facilities, other Exxon facilities. So, they may live here in Santa Barbara or Ventura but commute either to the Gulf of Mexico, do a month on, a month off. I talked to a guy who lives down in Ventura. He flies to Central Africa and does monthlong -- what are called hitches there. It was majorly disruptive to a lot of families.

JERRY ROBERTS: Are these union jobs?

TYLER HAYDEN: Yeah.

JERRY ROBERTS: So, Das, and Greg, and Joan are squeezed between the unions and the enviros?

TYLER HAYDEN: Yeah. Yeah, pretty much. It'll be interesting to see how it shakes out once it actually kind of moves to their level on the Planning Commission level.

JERRY ROBERTS: Did you find Andy Caldwell's testimony, Josh, at this hearing to be remarkably aligned with Nick's rantings?

JOSH MOLINA: I usually save my Independent reading for later in the week, so I haven't actually read Nick's column yet. And I couldn't see Andy Caldwell because Tyler and I had--

JERRY ROBERTS: There were so many people?

JOSH MOLINA: -- a row of people blocking us. So, I was too busy fidgeting with my computer.

JERRY ROBERTS: How do you break down the politics of it?

May 8, 2019 Newsmakers video, NewsmakersWithJR, (May 8, 2019)

Latham & Watkins

October 17, 2025

Transcript by TransPerfect

JOSH MOLINA: Andy Caldwell's a veteran, and he's very articulate and well spoken. And he speaks well for his constituency, and he's a smart guy. So, obviously, he makes a lot of sense on these issues. I mean, he drives home that point of, it's better to get it here than get it from far away, from foreign oil sources. And we all use it. We all depend on it. Let's be realistic. These are real people. You guys say you care about working-class people. Well, there's a roomful of them, and you don't want them to have jobs. I mean, he hits those issues really well. Of course, the environmentalists want to look toward other sources, solar energy, wind energy, and they're equally smart on the issue.

JERRY ROBERTS: Is it realistic?

NICK WELSH: It'll take a while. I mean, it's an interesting argument. Andy makes it pretty much every time. The counter is, if we build it, or don't build it here, or if we allow oil here, it has no effect on how much oil is produced in faraway lands with bad environmental track records, and despots and totalitarians running the show.

[OVERLAY]

NICK WELSH: Oil is an international market. Yeah, it's an international market, and what we do or don't do here isn't going to really make a hill of beans in terms of global demand.

JERRY ROBERTS: You accept that argument?

SUPERVISOR LAURA CAPPS: I think that's a depressing way to live, to think like that, actually.

JERRY ROBERTS: Why? That's globalism, isn't it?

SUPERVISOR LAURA CAPPS: It doesn't matter what we here, so let's just keep doing the bad thing that we do when all the scientists tell us it's not the right way.

NICK WELSH: They say, actually, it's the other way in this particular case. The environmentalists are arguing that oil is still going to be produced in Nigeria in the same quantities, whether Santa Barbara allows additional quantities to go forward or it doesn't. So, they're saying Sandy's argument, that if we do it here, we'll do it better, is going to make much difference environmentally.

SUPERVISOR LAURA CAPPS: I see. I see.

JERRY ROBERTS: What's the next step?

TYLER HAYDEN: There's appellate comment open till the end of the month, and then it'll keep moving up to pipeline, so to speak.

JERRY ROBERTS: How many years is this going to take?

May 8, 2019 Newsmakers video, NewsmakersWithJR, (May 8, 2019)
Latham & Watkins
October 17, 2025
Transcript by TransPerfect

TYLER HAYDEN: It's supposed to the Supervisors in the fall, so that's pretty quick.

[00:15:00]

This was submitted, I think, a year and a half ago, this permit proposal. So, it's been working its way through.

NICK WELSH: Is this a [PH 00:15:06] stroping hearing? So, there wasn't anybody from the Planning Commission talking?

TYLER HAYDEN: There wasn't anybody from the county talking. It was a five-minute staff presentation in the beginning just running through the basics, bullet points, of what we're talking about, and then it was them sitting and listening for two and a half/three hours from anybody--

[OVERLAY]

JOSH MOLINA: And basically, the preferred alternative is, they can't have these trucks going if it's going to rain more than half an inch, if there's 50-percent change of raining more than half an inch during a 24-hour period. So, they don't have to--

JERRY ROBERTS: But, ultimately, this is going to go to the Supes, right?

TYLER HAYDEN: It is.

NICK WELSH: Yeah.

I hereby certify that “May 8, 2019 Newsmakers video, NewsmakersWithJR, (May 8, 2019)” is, to the best of my knowledge and belief, a true and accurate transcription from English to English. The transcript represents the media retrieved from <https://www.youtube.com/watch?v=lsAMb1gQYrA> from 00:10:44 to 00:15:42 of its running time.

Anders Nelson

Anders Nelson (Oct 17, 2025 13:46:53 EDT)

Anders Nelson
Project Manager
TransPerfect Legal Solutions

October 17, 2025

EXHIBIT 9

County Supervisor Laura Capps's Post

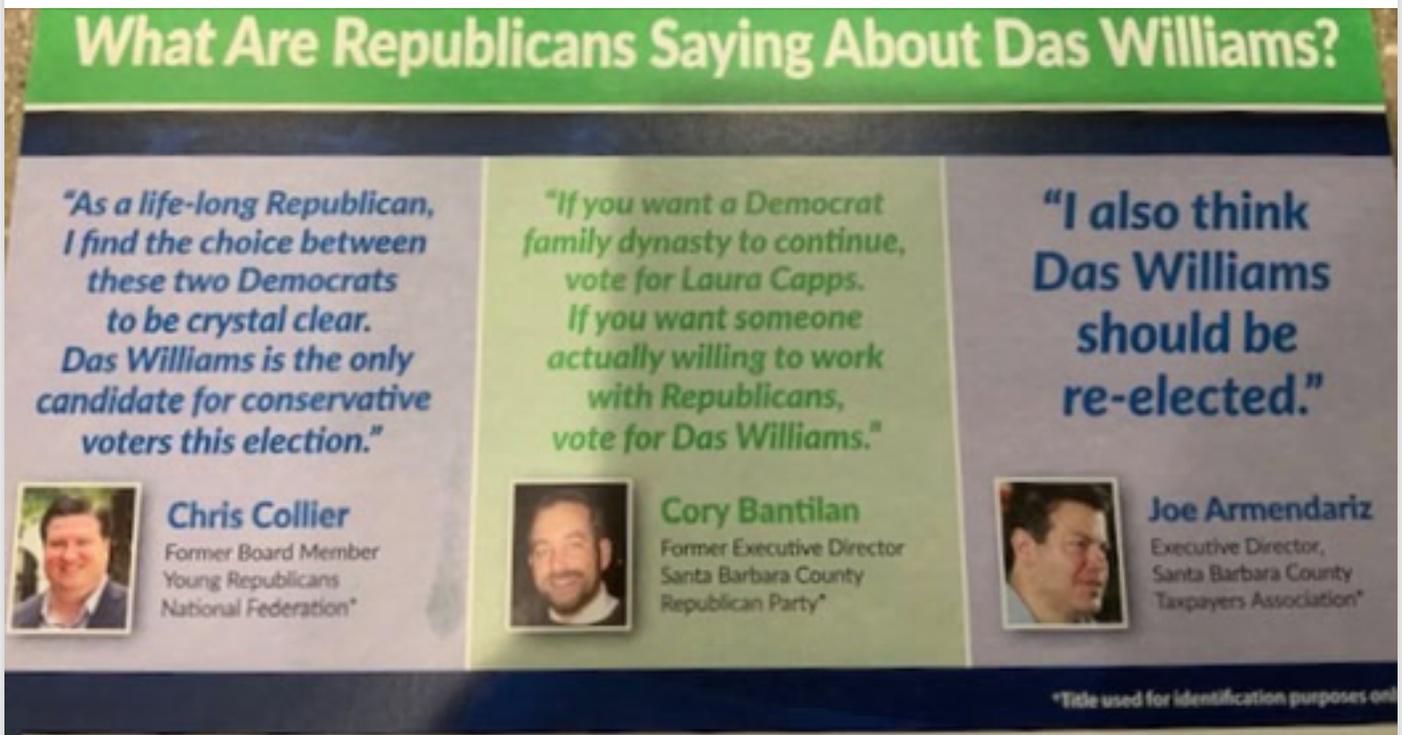


County Supervisor Laura Capps

February 19, 2020 · 🌐

We should all be wondering why the people behind PLAINS ALL AMERICAN PIPELINE are totally out front supporting my opponent. This smart piece by Mary O'Gorman explains it. Please share and VOTE.

<https://www.independent.com/.../where-the-special...>



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What possible reason would these veteran oil lobbyists have for going out on a...

42

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Mary Frink

Capps is only against Das. She's "for" nothing. Embarrassing.

5y



Liz Pretzinger replied · 1 Reply

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EXHIBIT 10

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Where the Special Interests Roam



By **Mary O'Gorman, S.B.**

Wed Feb 19, 2020 | 4:26pm



What Are Republicans Saying About Das Williams?

"As a life-long Republican, I find the choice between these two Democrats to be crystal clear. Das Williams is the only candidate for conservative voters this election."

Chris Collier
Former Board Member
Young Republicans
National Federation*

"If you want a Democrat family dynasty to continue, vote for Laura Capps. If you want someone actually willing to work with Republicans, vote for Das Williams."

Cory Bantilan
Former Executive Director
Santa Barbara County
Republican Party*

"I also think Das Williams should be re-elected."

Joe Armendariz
Executive Director,
Santa Barbara County
Taxpayers Association*

*Title used for identification purposes only

Paid for by Central Coast Residents Supporting Das Williams for Supervisor 2020. FPPC ID: 1424671, 1787 Tribute Road, Suite K.

Credit: courtesy

For the past many days I have been trying to absorb the shockwaves from the impact of the pro-Republican, pro-oil hit pieces sent out by the pro-Das Williams PAC formed by current county employee Cory Bantilan in conjunction with Democratic Party operative Mollie Culver. Apart from that incongruous alliance, I am particularly struck by the quotes from well known oil company lobbyists Chris Collier (Rincon Strategies, who represented Plains All American and Venoco) and Joe Armendariz on the pro-Das mailers. Collier states: "I find the choice between these two Democrats crystal clear – Das Williams is the only choice for Conservative voters in this election."

I was chief of staff for former supervisor Janet Wolf from 2007-19. In her previous three elections and reelections, these same oil lobbyists invested much time and effort in trying to unseat her as they knew she would not do them any favors. Supervisor Wolf was board chair at the time of the devastating 2015 Plains All American Oil disaster and had to stand strong against these very same lobbyists as they attempted to ease the path for Plains and other oil companies, e.g., Venoco, to resume operations.

Plains is gearing up for upcoming Planning Commission and Board of Supervisors hearings in the next year in order to re-open their pipeline that traverses the county. Other oil company applications totaling almost 800 wells are also in some stage of environmental review in Santa Barbara County. <http://countyofsb.org/pln/dev/energy.sbc> What *possible* reason would these veteran oil lobbyists have for going out on a limb for one Democrat against another? Such unprecedented allegiance to and promotion of a Democratic elected official who may likely be voting on a massive oil project should raise concerns or at least questions among erstwhile environmentalists.

I long ago endorsed Laura Capps as I have confidence that she will stand up relentlessly against the fossil fuel industry and *any industry* seeking to monetize land use in this county. This recent display of special interest lobbying just reinforces the wisdom of her candidacy.

Fri Oct 24, 2025 | 21:47pm

<https://www.independent.com/2020/02/19/where-the-special-interests-roam/>

EXHIBIT 11

[04:27:16]

MALE 1: Supervisor Capps.

SUPERVISOR LAURA CAPPS: I'll follow with a counter perspective with due respect to Supervisor Nelson. I want to thank Chair Williams for the legislation that, of course, drew so much support from this community after that devastation. I can only imagine what it had been like to be elected a leader with that tragedy happen -- that had such devastation. And, of course, you want to do what you can to put in remedies, and, of course, safety valves is logical. So, thank you. And I know he puts -- I think intentionally, trying jam you here, and I just want to acknowledge that elephant in the room because, of course, you're doing the right thing. I'm sure the Board was supportive at the time, as we Senator Jackson. I want to thank the Planning Commission, too, because I know this was two days of hearings, and they really took a tough look. They objected to the fact that there wasn't a full EIR. That's something that I share. I don't understand that. I'm still learning processes, but I don't understand why there wouldn't be a full EIR on something this important. And I want to thank our advocates and our constituents who -- this is by far the most number of emails and calls we've gotten since my time on the Board because this is what Santa Barbara cares about, Santa Barbara County, not just certain districts where the pipeline touches but the coastline that I represent, the islands that I represent, all the way from Gaviota Coast, down to East Beach. This is who we are, and I appreciate our constituents seeing the big picture here because this -- I respect that we're being asked to talk about valves, but it defies logic for me that you would need safety valves if you don't restart. And with due respect, it's not improper for me to look at the big picture. It's actually my job to look at the big picture. I was elected to look at the big picture, and big picture is climate change. It's our reliance on fossil fuels. It's a direction that we're headed in the wrong direction, nine years of the hottest temperatures on Earth recorded. Mass climate events continue to happen and, yet, we're being asked to say thumbs up or thumbs down on a myopic piece of this. I say, no, to that. I appreciate the analogy about seat belts. Of course we're all for seat belts, but you wouldn't put seat belts on a car that had been in a massive crash because the driver was criminally liable. I am tasked with representing my district. I am tasked with looking for the future. And for me, this is about restarting. This is about putting oil back in that pipeline and having safety valves for that use. And that is not something that I can stand behind, and so I'm voting to deny.

I hereby certify that “Excerpts from the August 22, 2023 Board Hearing Transcript” is, to the best of my knowledge and belief, a true and accurate transcription from English to English. The transcript represents the media retrieved from <https://www.youtube.com/watch?v=sA5oFjPSQiA> from 4:27:16 to 4:30:09 of its running time.

Anders Nelson

Anders Nelson (Oct 17, 2025 13:37:35 EDT)

Anders Nelson
Project Manager
TransPerfect Legal Solutions

October 17, 2025

EXHIBIT 12

[06:07:12]

MALE 1: Supervisor Capps.

SUPERVISOR LAURA CAPPS: Thank you. So, while it's nothing personal with people sitting here, unlike Mr. Cappello, I do have something against Exxon Mobil. In fact, I note that on Friday the State of California launched a lawsuit of Exxon and two other companies for decades of deceiving the public by downplaying the risks posed by fossil-fuel companies. Downplaying risks is what they do, and I believe that we have suffered the consequences as a people and as a planet. However, I agree with the two colleagues that spoke before me. Change of ownership is an administrative action, doesn't have any impacts on our environment. I've been convinced that it's not a step towards the restart of a damaged pipeline. It's not about the integrity of the pipeline. This is really about the integrity of making sure that our county permit actually matches the company that owns the pipeline, and that's important. More broadly, one of the reasons why I'm sitting here today on this board is to address the climate crisis and decrease our dependence on fossil fuels. I feel that call, that mission urgently. So do so many people in our community. Environmentalism is in our DNA, yet they're not here today, because I believe that they've come to the same conclusion, that this is not about restart. This is not about flow of oil. This is not about potential increase of fossil-fuel dependence. So, with that, I'm happy to deny the appeal and support the Planning Commission, which I really want to thank for their diligent work, as well as our staff. Thank you.

I hereby certify that “Excerpts from the September 19, 2023, Board Hearing Transcript” is, to the best of my knowledge and belief, a true and accurate transcription from English to English. The transcript represents the media retrieved from <https://www.youtube.com/watch?v=oyJS2DWdkyQ> from 6:07:12 to 6:08:52 of its running time.

Anders Nelson

Anders Nelson (Oct 17, 2025 13:39:47 EDT)

Anders Nelson
Project Manager
TransPerfect Legal Solutions

October 17, 2025

EXHIBIT 13

Message

From: Laura Capps [lcapps@countyofsb.org]
Sent: 5/8/2025 5:57:45 PM
To: Eleanor Gartner [egartner@countyofsb.org]; Chris Henson [chenson@countyofsb.org]; Daniela Aguirre [daguirre@countyofsb.org]
Subject: Restarting Sable's Pipeline Would Harm Our Communities, Environment, and Econo

<https://www.independent.com/2025/04/25/restarting-sables-pipeline-would-harm-our-communities-environment-and-economy/>

By our new friend Dr Mahdavi

FYI
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