

Katherine Douglas

Public Comment - Group 4

3

LATE
DIST

From: Bonnie L Bosma <blb.nhswind@gmail.com>
Sent: Friday, October 17, 2025 4:11 PM
To: sbcob
Subject: RE: May 13, Agenda Item: 2030 Climate Action Plan – Oil and Gas Facilities

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Santa Barbara County Supervisors,

Thank you for passing the Climate Action Plan ("CAP") on August 27, 2024, which outlines actions we can take to help meet the goal of reducing greenhouse gas emissions by 50% by 2030. Thank you also for recognizing the omission of oil and gas facilities from the CAP and passing the RESOLUTION – OIL AND GAS ACTIONS, asking staff to return with options for including oil and gas facilities.

The only way to reduce emissions in this sector is to not allow new oil and gas projects, and to begin the process of phasing out oil and gas facilities once they have been fully amortized and their investments have been recouped. We urge you to take the next step and ask staff to return with an oil and gas phase out ordinance.

Just as setting 100% renewable energy goals and joining Central Coast Community Energy has allowed Santa Barbara County (the "County") to participate in a planned and affordable transition to renewable energy, setting a goal to phase out fossil fuel production will help the County plan an orderly transition away from oil and gas, provide landowners and industry with certainty, and head off costly project proposals that conflict with County efforts to protect our air, water, health, and climate.

1. Fixes the loophole: Our CAP should be both ambitious and accurate. As the UN's International Panel on Climate Change [reports](#), "The evidence is clear: the time for action is now. We can halve emissions by 2030...The next few years are critical." At this critical juncture, continuing to exclude and ignore a major greenhouse gas emissions source in the County is unacceptable. Including oil and gas facilities in our County's CAP also improves its compliance with CEQA, as explained by [Carstens, Black & Minter](#).

2. Limits the most climate-damaging oil production: The oil projects that have been proposed in the County over the past decade have been cyclic steam or steam flooding proposals, which are the most energy-intensive forms of oil production. The carbon intensity (which measures the full carbon cost including production, transportation and refining) is higher than the average oil imported from around the globe. The carbon intensity of California-sourced oil is growing [at three times the rate](#) of oils produced outside of

California. The unconventional oil left in the County is particularly harmful to the environment and should be phased out first.

3. Improves air quality and health outcomes: Diesel trucks and gas-burning steam generators not only produce greenhouse gases, but they also emit health-damaging air pollution that causes cancer, asthma, heart disease, and other conditions. For instance, according to the [California Air Resources](#)

[Board](#), oil production was the largest facility source of PM2.5, Benzene, Formaldehyde, VOCs, Nitrogen Oxide and Sulfur Oxide in the County in recent years. Phasing out oil will save lives.

4. Improves the safety of our drinking water supplies: Many oil projects are in the vicinity of critical drinking water aquifers. For instance, oil companies are currently seeking an exemption from federal drinking water protections in Cat Canyon to inject toxic wastewater below the Santa Maria Groundwater Basin, which provides drinking water to 190,000 people. A state study identified 291 existing wells that may serve as pathways for the migration of toxic substances in that field. In addition, there have been documented oil spills into [creeks, rivers and watersheds](#), and a [superfund](#) site. Page 50 of that EPA plan notes that, "Cleanup of groundwater in this area is technically impracticable and would likely require several thousand years."

5. Improves road safety and trucking accidents: Due to the Phillip 66 refinery closure, trucking is increasingly used to transport oil. Recent proposals have included adding thousands of additional oil tanker truck trips annually to local roads. [Oil tanker accidents](#) have created hazardous traffic, shut down roads, and have caused fires and spilled oil into waterways.

6. Safeguards wildlife and endangered species: Oil production kills and harms endangered and sensitive plants and animal species. The Central Coast's Mediterranean biome is a hotspot of biodiversity. The region contains numerous endemic, federally-listed, and sensitive species which require protection.

7. Prevents disasters: Oil projects are located in high fire hazard zones and increase [wildfire risks](#). Additionally, wastewater injections can [trigger earthquakes](#). Phasing out oil will help prevent future natural disasters from wreaking havoc.

8. Saves resources: Per the UCSB report on the benefits of an oil phase out, revenues to the County from local oil production (just \$3.3 million in property taxes or approximately 0.2% of county revenues) are low relative to some other land uses while costs to the County (accounting, legal, road repair, emergency services, etc.) are higher than other industries.

Other jurisdictions including the city and county of Los Angeles have already passed oil phase out ordinances, and such actions have been further facilitated by the passage of [AB 3233](#) last year clarifying the right of local jurisdictions to regulate oil. Health and safety

regulation has long been the responsibility of local governments. The City of Santa Barbara has [prohibited oil drilling](#) for at least 60 years.

We urge you to direct staff to research and draft an appropriate and legally defensible oil and gas phase out plan and ordinance.

Regards,

Bonnie L Bosma

Katherine Douglas

From: James Medley <jamestoy921@gmail.com>
Sent: Friday, October 17, 2025 4:46 PM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is James Toy Medley and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards James Toy Medley

Sent from my iPhone

Katherine Douglas

From: Mary Byrd <mary@byrdwire.net>
Sent: Friday, October 17, 2025 4:51 PM
To: sbcob
Subject: Board of Supervisors Meeting Oct. 21, 2025 Agenda Item #3 under Departmental Agenda

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To

the Santa Barbara County Board of Supervisors:

Thank

you for supporting the phase out of oil and gas operations in Santa Barbara County. Oil and gas production pollutes the air, water, and soil, and is a major source of greenhouse gases that cause climate change. My family members and I are longtime residents

of the County and have seen devastating impacts from climate change here, including wildfires, flooding and debris flows. We also know the many special endangered and sensitive species of plants and animals here are harmed by oil and gas production activity.

Reducing

oil production would help the County meet our climate goals, and reduce the magnitude of climate-related events long term. As we move to a greener economy, jobs will be created in well decommissioning, and cleaner energy.

Please

vote in support of moving forward with a Santa Barbara County Oil & Gas Phase-Out Ordinance that includes the following key provisions: -Prohibit New Extraction or Production Facilities: No new permits for oil and gas drilling, redrilling, deepening of wells,

or accessory production facilities shall be issued. -Nonconforming Use Designation: Existing oil and gas operations shall be classified as 'nonconforming uses' and will be subject to an amortization period before mandatory cessation and removal. -Just Transition

Support Policies: Commission a workforce development study and subsequent programing to assist oil and gas industry workers in transition to other employment sectors, with particular support for transition to clean energy jobs.

Our

children and grandchildren - and the plants and animal species that live here - will thank you for cleaner air, water, and soil, and a more secure future.

Thank

you,

Mary

Byrd Santa

Barbara County

Katherine Douglas

From: Justin Martin <jrmartin101189@gmail.com>
Sent: Friday, October 17, 2025 6:22 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Justin Martin and while I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry. This will be detrimental and destructive to not just the people, families and homes in Santa Barbara County but it will have ripple effects to surrounding counties and the state as a whole.

Sincerely,

Justin Martin

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

,

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Phillips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned “methods of production in existing wells.” *NOPEC*, at 11. Judge Kin found that the City’s ordinance impermissibly “restricts the [State Oil and Gas] Supervisor’s ‘express, statutorily-conferred authority to decide what oil production methods are suitable in each case,’” and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court’s ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to “supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case.” Pub. Resources Code § 3106(b). AB 3233 doesn’t negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State’s hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor’s duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board’s plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City’s costly amortization studies open to legal attack, while doing nothing to protect the City from inverse

condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

--
Justin R. Martin
Cell - 805-478-2120
jrmartin101189@gmail.com

Katherine Douglas

From: John Martin <johnfmartin1212@gmail.com>
Sent: Friday, October 17, 2025 6:25 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is John Frank Martin and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards John Frank Martin

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the

protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11.

Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case,'" and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq.*, the state has vested **complete** authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced

with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: Susan Shields <shields3033@netscape.net>
Sent: Friday, October 17, 2025 9:21 PM
To: sbcob
Subject: October 21 BOS meeting on the Oil Phase Out ordinance.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I vote in Santa Barbara County and want to congratulate the Board of Supervisors for adopting the 2030 CAP as a step forward to reducing greenhouse gas emissions and thereby creating a cleaner environment to combat the climate crisis. I encourage the board to take further steps and prohibit new oil projects and phase out existing drilling.

AB 3233 has given local governments more control over oil and gas industry pollution and emissions and Santa Barbara has the authority to make decisions regulating oil and gas emissions within the county. To protect the well-being of my and everyone else's grandchildren, I believe the board has the responsibility to end oil drilling in our county.

Susan Shields
3033 Calle Rosales, SB 93105

Katherine Douglas

From: Laura <laura.hamman@gmail.com>
Sent: Friday, October 17, 2025 9:59 PM
To: sbcob
Subject: October 21 BOS meeting on the Oil Phase Out ordinance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Chair and Members of the Board of Supervisors,

I want to begin by expressing my deep appreciation to the Board and County staff for your continued work to protect the health of our communities and preserve Santa Barbara's extraordinary natural environment. The consideration of an oil phaseout ordinance is a courageous and forward-looking step toward safeguarding both our residents and ecosystems.

This issue is deeply personal to me. Climate action matters not only for this generation but for my children's future and the wellbeing of our community as a whole. We owe it to them to build an economy and environment that are clean, resilient, and safe. Every decision we make now shapes the kind of county we leave behind.

I urge the Santa Barbara County Supervisors to prepare ordinance amendments that prohibit new oil drilling and phase out existing oil operations. Phasing out oil extraction is essential to meeting our climate goals and protecting our air, land, and water from the harms of pollution. It is a necessary step toward a sustainable, healthy, and economically vibrant future.

Santa Barbara has lived through the painful consequences of oil dependence—most memorably the 1969 Union Oil blowout and the 2015 Plains All American Pipeline rupture, in addition to numerous smaller onshore spills. Each incident left lasting damage to our ocean, wildlife, and coastline. We have a responsibility to prevent further devastation and set policies that reflect our values of stewardship and responsibility.

As California faces an idle well crisis, Santa Barbara has a unique opportunity to lead by example. Ending oil extraction here would demonstrate our commitment to a cleaner, safer, and more sustainable future for all Californians. Oil operations contribute heavily to air and water pollution, posing serious risks such as asthma, heart disease, and cancer. These impacts fall disproportionately on low-income communities and communities of color across our county. Ending oil drilling is therefore not only an environmental imperative but a matter of environmental justice.

The signing of AB 3233 grants local governments new authority over oil and gas operations. With this power, our county can take meaningful action to reduce greenhouse gas emissions, support California's climate goals, and deliver real local protections against industrial pollution. Moreover, with renewed interest by Sable Offshore Oil Company in resuming offshore treatment and storage, it

is urgent that Santa Barbara assert its authority over onshore operations to ensure our coastline and communities remain protected.

Phasing out oil drilling also opens doors for economic renewal. Our region has the talent and ingenuity to lead the transition toward renewable energy, sustainable construction, and green technology—creating jobs that honor both people and the planet. One major oil project could easily undo all the progress our residents have made in reducing emissions by switching to electric vehicles and rooftop solar. We cannot afford to take such a step backward.

The County has already demonstrated climate leadership through the adoption of the 2030 Climate Action Plan—a milestone achievement that set us on a path toward carbon neutrality. Now is the time to build on that momentum by establishing a firm timeline for ending oil drilling and accelerating our clean-energy transition.

Please stand with Santa Barbara’s residents, workers, and future generations by voting to phase out oil operations and prohibit new drilling. Let’s reaffirm our identity as a county that values health, equity, and environmental integrity above short-term profits.

Thank you for your vision, service, and ongoing commitment to our shared future.

With gratitude and hope,
Laura Hamman
Santa Barbara

Katherine Douglas

From: Amy Lowe <cakes101@gmail.com>
Sent: Friday, October 17, 2025 11:01 PM
To: sbcob
Subject: Oil and Gas Operations

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Amy Lowe and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Amy J Lowe

Katherine Douglas

From: m ton <pdll1836@gmail.com>
Sent: Saturday, October 18, 2025 7:35 AM
To: sbcob
Subject: Please do not stop oil production

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please reevaluate the position on oil production in Santa Barbara county. So many jobs and so much history is at stake. We are a local family here since the 1800's that produces just a few wells. We produce the cleanest oil and gas in the world with so many regulations. Why import oil from countries with no regulation and pretend it is doing something for our planet. Although not perfect we actually care and do all we can to feed families and create jobs locally earning you tax dollars to make much needed improvements. With AI demanding more energy why would anyone vote to stop oil production? This is the safest way to produce. Please vote no on stopping production.

Sincerely Punta De La Laguna LLC

Katherine Douglas

From: CASSANDRA BUSH <budncassie@verizon.net>
Sent: Saturday, October 18, 2025 8:38 AM
To: sbcob
Subject: HELP - OIL AND GAS INDUSTRY

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is CASSANDRA BUSH and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County. The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible. I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards

Cassandra Bush

Katherine Douglas

From: Debbie Miles-dutton <johndutton@frontier.com>
Sent: Saturday, October 18, 2025 8:57 AM
To: sbcob
Subject: Phase out oil drilling in Santa Barbara County

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors,

I appreciate that you are willing to consider the option of phasing out oil drilling in SB County. It's of great importance that we tackle climate change head on. With the federal government burying its head in the ground we at the local level need to redouble our push to combat climate change.

I urge you to prepare ordinance amendments that prohibit new drilling and phase out existing operations. This phasing out of existing operations is crucial to achieve our climate change fighting goals and to protect our air, land and water from the impacts of climate change.

Santa Barbara has experienced several major oils spills in recent memory (1969 Union Oil rig blowout to the Plains Pipeline Rupture). With the idle wells crisis, Santa Barbara has the opportunity to show the way to other regions by setting an example toward a cleaner and more sustainable future. As is self evident, fossil fuel drilling and burning leads to asthma, heart disease, and cancer; a burden that is disproportionately put on low income communities and communities of color.

The County of Santa Barbara already took a significant step forward by adopting the 2030 CAP, I urge you to strengthen this commitment by setting a clear deadline for phasing out oil drilling entirely.

Sincerely,
John Dutton
3919 La Colina Rd
Santa Barbara, Ca 93110

Katherine Douglas

From: marilyn kandus <m.kandus@gmail.com>
Sent: Saturday, October 18, 2025 10:22 AM
To: sbcob
Cc: m.kandus@gmail.com
Subject: October 21 BOS meeting on the Oil Phase Out ordinance.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To all the county staff and elected officials,

Thank you for considering an oil phase out ordinance to safeguard the health of our communities and natural ecosystems.

I have lived along the coast and in Santa Barbara since 1980 and have experienced major oil spills and have seen the results of those oil spills.

It affects me deeply to see our beautiful coastline "tared and feathered".

It hurts my heart to see the Wildlife, suffer and die.

As an artist it hurts my soul.

And as a mother it sends warning signals throughout my body that we need to protect this land the animals and the people!

As an individual it affects my health and as a swimmer it affects my ability to swim in the waters I love.

We have a responsibility to prevent further pollution and habitat destruction and to take a stand and lead the way in climate action which will protect the health of our local communities now and in the future.

Thank you for maintaining authority over oil drilling.

Please strengthen our commitment by establishing a clear timeline for phasing out oil drilling and reducing the emissions it generates.

Sincerely,
Marilyn Kandus

Homeowner and resident of
751 San Ramon Dr.,
Santa Barbara, CA 93111

Katherine Douglas

From: Ann Dorsey <aedorsey@hotmail.com>
Sent: Saturday, October 18, 2025 10:45 AM
To: sbcob
Subject: Public comment for agenda Item 3

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Santa Barbara Board of Supervisors,

I urge you to approve moving forward with a Santa Barbara County Oil & Gas Phase-Out Ordinance and ensure it includes the following key provisions:

- *No new permits for oil and gas drilling, redrilling, deepening of wells, or accessory production facilities shall be issued.
- *Existing oil and gas operations shall be classified as 'nonconforming uses' and will be subject to an amortization period before mandatory cessation and removal.
- *Commission a workforce development study and subsequent programming to assist oil and gas industry workers in transition to other employment sectors, with particular support for transition to clean energy jobs.

It is important to enact the Oil & Gas Phase-Out Ordinance for the following reasons:

Reducing oil production would help Santa Barbara County meet climate goals and avoid millions in climate-related damages. A phaseout policy could prevent the release of [344,072 metric tons of CO2e by 2045](#), with avoided climate damages valued at [\\$21.8 million](#). An oil and gas phase-out ordinance would also directly support the state goal to phase out oil production no later than 2045.

A state study identified [291 existing wells](#) that may serve as pathways for the migration of toxic substances in that field. In addition, there have been documented oil spills into [creeks](#), [rivers](#) and [watersheds](#), and a [superfund](#) site. Page 50 of that EPA plan notes that, "Cleanup of groundwater in this area is technically impracticable and would likely require several thousand years."

The remaining hard-to-extract oil threatens our drinking water supplies. For instance, oil companies are seeking exemption from federal drinking water protections in Cat Canyon to inject toxic wastewater below the Santa Maria Groundwater Basin, which provides drinking water to 200,000 people.

An oil phase-out will improve air quality and help protect public health. For instance, according to the [California Air Resources Board](#), oil production was the largest facility source of PM2.5, Benzene, Formaldehyde, VOCs, Nitrogen Oxide and Sulfur Oxide in Santa Barbara County in recent years. These pollutants have serious negative health impacts such as cancer, asthma, heart disease, and other serious conditions, both acute and chronic.

Phasing out oil operations can create jobs. These [jobs require skills that are closely aligned with production and extraction](#) labor skill sets. Well decommissioning is a potential source of new employment for oil and gas workers. Asset repurposing through converting oil wells to high-temperature water wells for geothermal power generation can also provide new [employment opportunities](#). [Santa Barbara County has been](#)

[identified](#) as one of three within California particularly suited to this type of well re-use. Additionally, as the County works towards its climate goals, electrification and clean energy will provide a counterweight to lost fossil fuel jobs.

With a total local workforce of 209,500 jobs across all sectors county-wide, oil-related jobs make up just [0.0023% to 0.0054%](#) of all employment in the region. Jobs in the oil industry are high-risk and offer less stability than those in other industries. In a [recent industry survey](#), oil and gas workers reported severe job instability, declining wages and benefits, and safety concerns. Furthermore, the fatality rate for jobs in the oil and gas extraction industry is [7 times higher than other occupations](#), and the number of fatalities is rising.

Oil-related activities impose [significant costs](#) on county resources, including fire and emergency response, road maintenance, and regulatory oversight. Companies often [fail to cover the full cost of spills and may abandon sites](#), leaving state and local governments responsible for expensive cleanups. Despite these expenses, oil property taxes contribute only a fraction of the county's total revenue – just [\\$3.3 million or approximately 0.2% of county revenues in FY 2024-2025](#).

Other jurisdictions including the city and county of Los Angeles have already passed oil phase-out ordinances, and are currently re-introducing even stronger versions of the ordinances. Such policies have been further facilitated by the passage of [AB 3233](#) that took effect in January 2025 clarifying the right of local jurisdictions to regulate oil. Health and safety regulation has long been the responsibility of local governments. The City of Santa Barbara has [prohibited oil drilling](#) for at least 60 years.

The Trump administration announced plans [to open 400,000 acres of federal land](#) to new oil leases in Santa Barbara, Ventura, San Luis Obispo, Fresno, Kern, Kings, Madera, and Tulare counties. [On June 23](#) the Bureau of Land Management (BLM) announced they would be conducting environmental review to facilitate resuming its oil and gas leasing program in California. We need urgent and meaningful action from Santa Barbara to protect against even more drilling.

Thank you for taking action to protect communities by enacting the Santa Barbara County Oil & Gas Phase-Out Ordinance.

Ann Dorsey

Katherine Douglas

From: Tana Kincaid <tana@gntnz.com>
Sent: Saturday, October 18, 2025 3:34 PM
To: sbcob
Subject: Please ban new oil drilling and phase out existing wells.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear County Board of Supervisors,

I urge you to protect our children's future environment by preventing the possibility of another oil spill, reducing air pollution, protecting clean water, fighting climate change by lowering GHG emissions. All this can be accomplished by banning new oil drilling and phasing out existing wells.

We have a lot to lose here. Please help protect Santa Barbara.

Sincerely,
Tana Kincaid
1264 Mountain View Rd
Santa Barbara

Katherine Douglas

From: Tiffany Quinn <tiffanyquinn9@icloud.com>
Sent: Saturday, October 18, 2025 4:05 PM
To: sbcob
Subject: Santa Barbara County Board of Supervisors

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Tiffany Q. and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,
Tiffany Quinn

Katherine Douglas

From: Hod Gray <hgray@specialneedsproject.com>
Sent: Saturday, October 18, 2025 6:10 PM
To: sbcob
Subject: October 21 BOS meeting on the Oil Phase Out ordinance.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

As longtime resident of (and taxpayer in) Santa Barbara County, I urge the Supervisors to prohibit new oil projects and phase out existing drilling.

Hod Gray
1000 E. Maple Avenue
Lompoc, CA 93436
805.698.4143
bosshod@mac.com

Katherine Douglas

From: Lauren Leland <laurenaleland@gmail.com>
Sent: Sunday, October 19, 2025 1:06 PM
To: sbcob
Subject: Public comment for agenda Item 3 - 10/21

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors,

I am writing in full support of an oil and gas phaseout in Santa Barbara County. It is the only responsible decision to make to ensure a cleaner, safer and more equitable future for our communities.

The ordinance must include the following:

- 1. Prohibit New Extraction or Production Facilities:** No new permits for oil and gas drilling, redrilling, deepening of wells, or accessory production facilities shall be issued.
- 2. Nonconforming Use Designation:** Existing oil and gas operations shall be classified as 'nonconforming uses' and will be subject to an amortization period before mandatory cessation and removal.
- 3. Just Transition Support Policies:** Commission a workforce development study and subsequent programming to assist oil and gas industry workers in transition to other employment sectors, with particular support for transition to clean energy jobs.

Not only does oil and gas extraction lead to negative health impacts such as cancer, asthma and heart disease, but jobs in the oil and gas industry (of which there are relatively few in the county) are high-risk, with the fatality rate 7 times higher than other occupations. It is imperative that we protect our communities from the immediate pollution of these facilities, the impact of this industry on accelerating climate change, and provide opportunities for clean, safe jobs.

Sincerely,

Lauren Leland
Santa Barbara

Katherine Douglas

From: Isabelle Sistek <isabellesistek@ucsb.edu>
Sent: Sunday, October 19, 2025 2:19 PM
To: sbcob
Subject: Agenda Item 3

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,
My name is Izzi Sistek and I am a UCSB student.

I urge you to vote in support of moving forward with a Santa Barbara County Oil & Gas Phase-Out Ordinance that includes the following key provisions:

Prohibit New Extraction or Production Facilities: No new permits for oil and gas drilling, redrilling, deepening of wells, or accessory production facilities shall be issued.

Nonconforming Use Designation: Existing oil and gas operations shall be classified as 'nonconforming uses' and will be subject to an amortization period before mandatory cessation and removal.

Just Transition Support Policies: Commission a workforce development study and subsequent programming to assist oil and gas industry workers in transition to other employment sectors, with particular support for transition to clean energy jobs.

There would be economic benefits to pursuing a clean energy economy and alternate uses for land now dedicated to oil production. A recent UCSB report on the benefits of an oil phase-out calculates that it could prevent an estimated \$54 to \$81 million in mortality related costs by 2045.

As a young person, our futures are at stake. We must take steps to a renewable future NOW.

Thank you for your consideration.

Sincerely,

Izzi Sistek

Katherine Douglas

From: joanna.tang@lifesci.ucsb.edu
Sent: Sunday, October 19, 2025 2:33 PM
To: sbcob
Subject: A Fossil-Free Santa barbara

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board Members:

As a Goleta resident, I am writing to urge you to authorize County staff's two-step plan to phase out existing and new oil drilling, and to add the project to Long-Range Planning's Annual Work Program. Our community deserves clean air. Phasing out oil and gas will reduce air pollution and protect public health for everyone. Many local oil projects use dirty, carbon-polluting techniques like steam injection and are one of the major sources of GHG emissions in the County. Phasing out these operations is critical to fighting climate change.

Oil and gas operations inject wastewater underground, threatening clean water. In the Cat Canyon oil field alone, a state study identified 291 wells that pose a risk of contaminating the Santa Maria groundwater basin, which is relied upon by 190,000 community members in North County. Phasing out oil and gas will protect our precious groundwater.

There is local precedent for phasing out oil and gas operations, and I urge you to help us continue forging our path toward a more sustainable and clean future. The County (and later Goleta) engaged in a process aimed at permanently shutting down the Ellwood Onshore Facility after a set period and once investment costs were recovered. State legislation went into effect this year that empowers the County to pass an oil and gas ban and phase out ordinance that protects public health and the environment from the impacts of fossil fuel extraction.

Thank you for protecting our communities, climate, and our natural resources.

Sincerely,

Joanna Tang, PhD

University of California, Santa Barbara

Katherine Douglas

From: Christiane Schlumberger <c.schlumberger@me.com>
Sent: Sunday, October 19, 2025 2:45 PM
To: sbcob
Subject: Phase Out Oil Drilling in Santa Barbara County

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors:

I am a Santa Barbara County resident. I am writing to urge you to take steps to ban new oil drilling and phase out existing operations to reduce air pollution, protect our drinking water, safeguard our health, and help meet our County's plan to Cut GHG pollution. I endorse the points made by our local Environmental Defense Center:

- Please authorize County staff's two-step plan to phase out existing and new oil drilling, and to add the project to Long-Range Planning's Annual Work Program
- Our community deserves clean air. Phasing out oil and gas will reduce air pollution and protect public health for everyone.
- Many local oil projects use dirty, carbon-polluting techniques like steam injection and are one of the major sources of GHG emissions in the County. Phasing out these operations is critical to fighting climate change.
- Oil and gas operations inject wastewater underground, threatening clean water. In the Cat Canyon oil field alone, a state study identified 291 wells that pose a risk of contaminating the Santa Maria groundwater basin, which is relied upon by 190,000 community members in North County. Phasing out oil and gas will protect our precious groundwater.
- There is local precedent for phasing out oil and gas operations. The County (and later Goleta) engaged in a process aimed at permanently shutting down the Ellwood Onshore Facility after a set period and once investment costs were recovered.
- State legislation went into effect this year that empowers the County to pass an oil and gas ban and phase out ordinance that protects public health and the environment from the impacts of fossil fuel extraction.

Thank you for your consideration.

Sincerely,

Christiane Schlumberger
Santa Barbara

Katherine Douglas

From: Aurora Meadows <a4meadows@gmail.com>
Sent: Sunday, October 19, 2025 4:41 PM
To: sbcob
Subject: October 21 BOS meeting on the Oil Phase Out ordinance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

- As a parent of a 14 year old in Carpinteria, I am urging you to prepare ordinance amendments prohibiting new drilling and phasing out oil operations. Phasing out oil drilling is crucial to achieving our climate goals and protecting our air, land, and water from the harmful impacts of oil drilling.
- Santa Barbara has experienced several major oil spills in recent history, from the 1969 Union Oil drilling rig blowout to the 2015 Plains All American Pipeline rupture, as well as many onshore oil spills. **We have a responsibility to prevent further pollution and habitat destruction** and combat long-term damage to our ocean, land, and wildlife caused by oil drilling.
- As California faces an idle well crisis, **Santa Barbara has an opportunity to lead the way in climate action**, setting a strong example for other regions to follow. Ending oil extraction shows a commitment to a cleaner, more sustainable future.
- Oil drilling contributes to air pollution and water contamination, which can have **detrimental effects on public health**, leading to asthma, respiratory issues, heart disease, cancer, etc. Low-income communities and communities of color in Santa Barbara County disproportionately suffer from pollution and health problems linked to oil operations. Ending drilling is a **vital step toward environmental justice** and will help **safeguard the health of our local communities** for generations to come.
- With the signing of AB 3233, local governments have more control over oil and gas industry pollution and emissions compared to other emissions sources. Transitioning away from oil drilling supports efforts to **reduce greenhouse gas (GHG) emissions and fight climate change**.
- Recent developments with Sable Offshore Oil Company's plans to pursue offshore oil storage and treatment in federal waters underscore the urgency of local action. While federal waters are beyond county control, **Santa Barbara retains clear authority over onshore drilling** and can act decisively to protect public health and the environment.
- Phasing out oil drilling opens the door for **sustainable job creation in renewable energy and green technology sectors**.
- One oil operation could erase all of the hard work by county residents to cut carbon emissions and pollution. Ignoring the impacts of **oil drilling undermines the progress we've made by switching to electric cars and solar** and pushes California further from its goal of achieving a carbon-neutral economy by 2045.
- The County of Santa Barbara already took a significant step forward by adopting the 2030 CAP — a major victory for climate advocates in the region. We urge our elected

officials to **strengthen this commitment by establishing a clear timeline for phasing out oil drilling** and reducing the GHG emissions it generates.

Your choices matter for the future inhabitants of Santa Barbara. Thank you for doing the right thing!

Aurora

 Aurora Meadows

 a4meadows@gmail.com

 805.637.3177

Katherine Douglas

From: Justin Martin <justin.martin@pceclp.com>
Sent: Monday, October 20, 2025 5:40 AM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Importance: High

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Justin Martin and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County. I am 36 years old and have been working in the oil and gas industry within Santa Barbara County for 13 years. This industry has given my family and I the ability to afford a home, put our daughter through college and assisted me in getting 2 Associates in Science degrees as well as a Bachelors degree. Without the support of the oil and gas industry, I would not have been able to accomplish this in the time that I did and without debt. The oil and gas industry supports a major part of our community, infrastructure and daily lives.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible. These actions to phase out and shutdown the industry in Santa Barbara County will not just affect the oil and gas companies. This will impact hundreds of businesses locally and within the state that support these operations from family-owned small businesses to major chain corporations.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve. This would Undermind all the hard work and efforts that others have put forward to achieve the same goals that I have and in perusing their portion of the American dream.

"Do what's right, not what's easy"

-TMAC

Justin R Martin, GSP
Pacific Coast Energy Company, LP
EHS Manager
1555 Orcutt Hill Road
Orcutt, CA 93455
Office: 805-937-2576 x3246
Cell: 805-314-8913
justin.martin@pceclp.com
<https://pceclp.com/>



Katherine Douglas

From: Sebastien Butler <sebastien.butler@pceclp.com>
Sent: Monday, October 20, 2025 6:26 AM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Sebastien Butler and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards
Sebastien Butler

Sebastien Butler
Diatomite Control Room Operator
Pacific Coast Energy Company LP
Orcutt Hill Field
(805)310-7163
sebastien.butler@pceclp.com



Katherine Douglas

From: Tio Mallet <tio.mallet@pceclp.com>
Sent: Monday, October 20, 2025 6:34 AM
To: sbcob
Subject: SBC Oil and Gas Phase Out

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Tio M Mallett and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards Tio M Mallett

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

,
To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11. Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case,'" and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), et seq, the state has vested complete authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of statewide concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will

end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Tio Mallett

Diatomite Control Room Operator

Pacific Coast Energy Company LP

Orcutt Hill Field

(805)310-7163

Tio.mallett@pceclp.com



Katherine Douglas

From: Patrick Glenn <patrick.glenn@pceclp.com>
Sent: Monday, October 20, 2025 8:03 AM
To: sbcob
Subject: Opposition of the SBC Oil & Gas Phase Out

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Patrick Glenn and though I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards,
Patrick Glenn

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of

dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

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Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by

state law because it impermissibly banned “methods of production in existing wells.” *NOPEC*, at 11. Judge Kin found that the City’s ordinance impermissibly “restricts the [State Oil and Gas] Supervisor’s ‘express, statutorily-conferred authority to decide what oil production methods are suitable in each case,’” and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court’s ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to “supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case.” Pub. Resources Code § 3106(b). AB 3233 doesn’t negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State’s hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor’s duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board’s plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City’s costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Patrick Glenn

Katherine Douglas

From: Patrick Glenn <patrick.glenn@pceclp.com>
Sent: Monday, October 20, 2025 8:04 AM
To: sbcob
Subject: I Strongly Oppose the SBC Oil & Gas Phase Out

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Patrick Glenn, and I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,
Patrick Glenn

Katherine Douglas

From: Jeff Reiss <jreiss50@gmail.com>
Sent: Monday, October 20, 2025 8:13 AM
To: sbcob
Subject: SB County Action

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please:

Support Item 2 Capping idle oils wells

Support Item 3 Oil production phase out

Thank you.

Jeff Reiss

808-870-4063

jreiss50@gmail.com

Katherine Douglas

From: John Cunningham <drjohn@marinbenefits.com>
Sent: Monday, October 20, 2025 8:17 AM
To: sbcob
Subject: Phase Out Oil Drilling

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Clerk of the Board:

Good day,

Please authorize County staff's two-step plan to phase out existing and new oil drilling and to add the project to Long-Range Planning's Annual Work Program. Our community deserves clean air and we are faced with mounting threats from bad actors who disregard our home and pollute it through reckless unauthorized behaviors such as Sable Oil currently.

Think of those who will live here in 20 years from now! They need your leadership TODAY!

Regards,

John Cunningham
87 Skyline Circle, Santa Barbara

Katherine Douglas

From: Maria Cunningham <mariafelice@me.com>
Sent: Monday, October 20, 2025 8:36 AM
To: sbcob
Cc: Dr.Maria Felice Cunningham
Subject: Please Authorize the County's Two Step Program to phase out existing and or new oil drilling

Importance: High

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please use this copy of the letter!

October 19, 2025

Sable Oil and the Santa Barbara Pipeline

To: Honorable County Council Members of Santa Barbara County

From: Dr. Maria Felice Cunningham—Santa Barbara native daughter

Since I can first remember, I have been a ranger and steward of our Santa Barbara beaches and a steward of one of the most beautiful and fragile marine ecosystems on Earth — our coastline. The decision before you is not just about Sable Oil, or any other company wanting to drill in our channel.

It is about who we are as a community, and what moral compass, your North Star in decision making, is showing the public as trusted leadership for our future.

Santa Barbara has already lived through the cost of oil extraction — the 1969 spill that coated our beaches in black, killed thousands of sea creatures, and gave birth to the modern environmental movement. That tragedy was supposed to be our wake-up call. We promised ourselves and the generations to come that we would never again put short-term profit before long-term planetary survival.

Today, you stand as guardians of that promise. Climate change is not a distant threat — it is here. Our oceans are warming, acidifying, and losing life faster than science ever predicted. Every decision we make now must be weighed not in dollars, but in decades — and in the lives of our children and grandchildren who will inherit what we leave behind.

To allow Sable Oil to continue its operations, or anyone else, is to sanction risk in a time when our planet can bear no more. It is to say that corporate convenience outweighs community

responsibility. It is to ignore the deep moral truth that the health of our oceans is the health of our people.

Please think long and hard about allowing them to move forward in any way and to fight for everyone here now and in the future. If all politicians allow money to become more important than the moral and good, we as a species won't make it on this planet for long.

Thank you for your deep consideration.

Maria Felice Cunningham

Katherine Douglas

From: Cody Chaves <cody.chaves@pceclp.com>
Sent: Monday, October 20, 2025 8:52 AM
To: sbcob
Subject: Re: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Cody Chaves and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Cody Chaves

From: Cody Chaves <cody.chaves@pceclp.com>
Sent: Monday, October 20, 2025 8:40 AM
To: Justin Martin <justin.martin@pceclp.com>
Subject: Re: URGENT - SBC OIL & GAS PHASE OUT

My name is Cody Chaves and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards Cody Chaves

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas

industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

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Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

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However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

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what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11. Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case,'" and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

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If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

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Sincerely,
Mike Stoker
President & CEO, SBCTAC

From: Justin Martin <justin.martin@pceclp.com>
Sent: Friday, October 17, 2025 4:09 PM
To: EHS <safetyculture@pceclp.com>
Subject: Re: URGENT - SBC OIL & GAS PHASE OUT

To the Santa Barbara County Board of Supervisors

My name is (FULL NAME) and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards (FULL NAME)

Chairwoman Capps & Honorable Board Members,

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Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: Robert Taylor <taylorrobert871@gmail.com>
Sent: Monday, October 20, 2025 9:01 AM
To: sbcob
Subject: Public Comment on Oil and Gas Phase-Out Ordinance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I support the county's efforts to phase out oil and gas. Residents of our county have been enthusiastically behind goals of reaching 100% renewable energy and joining with Central Coast Community Energy. Phasing out oil and gas is consistent with our goals to protect our air, water, health, and climate.

Bob Taylor
300 Hot Springs Road
Montecito, CA 93108
949-355-5624
taylorrobert871@gmail.com

Katherine Douglas

From: Tracey Singh <traceysingh50@gmail.com>
Sent: Monday, October 20, 2025 8:47 AM
To: sbcob
Subject: Item#3 Oct 21 Phase out oil

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear SB County Board of Supervisors,

Thank you for considering Oil Phaseout Ordinance.

Santa Barbara should be a global leader in protecting the natural environment .

Please prohibit new drilling and phaseout oil production.

We have a responsibility to prevent pollution and protect our future.

Tracey Willfong
Santa Barbara

Katherine Douglas

From: Justin Martin <justin.martin@pceclp.com>
Sent: Monday, October 20, 2025 9:09 AM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT
Attachments: Santa Barbara County Ordinance 10-17-25.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Justin Martin and as an employee of a company that is a member of CIPA, I wish to endorse their letter attached and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

"Do what's right, not what's easy"
-TMAC

Justin R Martin, GSP
Pacific Coast Energy Company, LP
EHS Manager
1555 Orcutt Hill Road
Orcutt, CA 93455
Office: 805-937-2576 x3246
Cell: 805-314-8913
justin.martin@pceclp.com
<https://pceclp.com/>





California Independent Petroleum Association
1001 K Street, 6th Floor
Sacramento, CA 95814
Phone: (916) 447-1177
Fax: (916) 447-1144

October 17, 2025

The Honorable Laura Capps
Chair, Santa Barbara County Board of Supervisors
105 E Anapamu Street Santa Barbara, CA 93101

Re: Proposed phase out of permitted oil operations in Santa Barbara County

Dear Supervisor Capps:

The California Independent Petroleum Association (CIPA) submits the following comments on the county's proposed phase out ordinance of permitted oil operations in the county:

1. The proposed ordinance contradicts Governor Newsom's new energy policy

Recently, the state legislature passed and the Governor signed SB 237, a bill designed to increase in-state production of crude. The bill is the result of months of investigation by the California Energy Commission into why California gasoline prices are so high. The conclusion was that the closure of more and more in-state refineries was leading to a volatile market since only eight refineries remained from more than 40 that existed forty years ago and two of those remaining are slated to close in the next year. One of the leading causes of refinery closures is the inability of the refineries to secure in-state sources of crude. Although California has become increasingly reliant on foreign imports, there is a maximum capacity of crude local refineries can offload at the ports. If Santa Barbara County and other jurisdictions decrease local production, the new policy will not be able to achieve its desired effect and Santa Barbara County will be responsible for exacerbating a failed state energy policy that has harmed California citizens.

2. The proposed ordinance will increase greenhouse gas emissions

Reducing oil and gas production in Santa Barbara County will result in an immediate, foreseeable increase in the importation of foreign oil. Importation of foreign oil results in increased GHG emissions from tanker ships carrying the oil and the oil itself, which is not climate compliant. By contrast, oil produced in California is climate compliant since it is produced in compliance with the state's rigorous GHG cap and trade reduction program. Imported oil is completely exempt from these programs. Additionally, these imports are exempt from California's other strict environmental, labor, and human rights regulations.

California produces only a fraction of the oil consumed by the State. In 2024, California produced an average of 309,000 barrels of oil per day, while consuming more than 1,800,000 barrels per day of fossil fuels, requiring over 75% of California's oil to be imported. Despite the state's efforts to transition to alternative fuels, fossil fuel consumption in California has not decreased. Since California is an "energy island", meaning that it does not have any pipelines that bring crude into the state, oil must be imported via foreign tanker. The largest sources of foreign crude oil into California are from Iraq, Ecuador, Brazil, and Saudi Arabia.

3. The proposed ordinance must be accompanied by a full CEQA EIR

The County failed to consider the significant, unmitigated, and unmitigable environmental impacts of the Ordinance in violation of the California Environmental Quality Act (CEQA). Specifically, the County failed to consider the increases in greenhouse gas (GHG) emissions that will result from Ordinance adoption. These significant impacts include, among other things, impacts to air quality, which are required to be analyzed under CEQA. For example, the increase in foreign oil shipped to California to replace oil that cannot be extracted under the Ordinance will result in an increase in the release of volatile organic compounds (VOCs) and nitrogen oxide (NOx) emissions from tanker ships (and, to a lesser extent, trucks) bringing this oil to California ports and refineries. This is in addition to the increased GHGs cited above.

In addition, CEQA recognizes any limitation on access to mineral resources of local, regional or statewide importance to be an environmental impact, *in and of itself*. Given that the Ordinance will necessarily result in limiting access to mineral resources of local, regional and statewide importance, it cannot be said that the Ordinance provide blanket “assurance” that the environment—which *includes mineral resources*—will be only protected, and not at all impacted. Petroleum and gas reserves in Santa Barbara County constitute a “known mineral resource that would be of value to the region and the residents of the state” the loss of availability of which necessarily results in a significant environmental impact. State CEQA Guidelines, Appendix G, section XII(a). The County’s failure to consider or address these impacts requires additional review under CEQA, and makes the Ordinance ineligible for exemption under the Common Sense exemption.

Moreover, such a failure to evaluate material environmental impacts would certainly be grounds for a CEQA challenge if committed by a project sponsor from the oil and gas industry. It is hypocritical for the County to exempt this project from CEQA under one or more categorical exemptions, where the County has consistently required projects by the oil and gas industry to fully and faithfully undertake the highest level of CEQA review, culminating in preparation of Environmental Impact Reports (EIR). Given the significant environmental impacts of the Ordinance, including the foreseeable and material increase in GHG emissions, it is inappropriate for the County to approve the Ordinance under a categorical exemption and avoid conducting the type of in-depth environmental review routinely required of the industry.

4. The proposed ordinance is preempted by federal law

The county is relying upon the protection of AB 3233 to support the proposed ordinance. The purpose of AB 3233 was to overturn a State Supreme Court ruling that ruled that Monterey County could not ban injection wells or regulate downhole operations because those activities are preempted by federal and state law. In 2015, Monterey voters passed Measure Z that banned new produced water injection wells and produced water ponds, phased out existing produced water injection wells and ponds; and banned new oil and gas wells within the county. The Supreme Court ruled in *Chevron U.S.A. Inc. v. County of Monterey* (2023 Cal. LEXIS 4349) that Measure Z went beyond the county’s land use authority and sought to prohibit certain oil and gas operations, including Class II injection wells. While the California legislature has changed state law pertaining to the regulation of downhole operations of oil and gas wells, it has no authority to change federal law. The Clean Water Act of 1972 clearly makes permitting of Class II injection wells a federal function. EPA granted the State of California primacy over the UIC program, but that did not include the ability of the state to delegate that authority to any other entity. This has been confirmed by Martha Guzman, former EPA Region 9 Administrator, in the letter she submitted to Representative Vicent Fong on October 11, 2024, “...the State may not delegate the approved Class II UIC program to another agency without review and approval by the EPA. This would include delegating to another agency the authority to approve or deny UIC Class II permits.” Accordingly, any application of the proposed ordinance to injection wells by the City of Los Angeles is illegal, since the State does not have the authority to delegate oversight of Class II injection wells to local governments regardless of the passage of AB 3233.

5. The proposed ordinance is an illegal taking of private property

The Ordinance represents an unconstitutional and unlawful taking of private property without just compensation, in contravention of the United States and California Constitutions. The state and federal Constitutions prohibit government from taking private property for public use without just compensation. Cal. Const., art. I, § 19; U.S. Const., 5th Amend.; *Chicago, Burlington & c. R'd v. Chicago* (1897) 166 U.S. 226, 239 (applying the federal takings clause to the states). In *Penna. Coal Co. v. Mahon* (1922) 260 U.S. 393, 415 (*Penna. Coal*), the United States Supreme Court recognized that a regulation of property that "goes too far" may effect a taking of that property. When a regulation does not result in a physical invasion and does not deprive the property owner of all economic use of the property, a reviewing court must evaluate the regulation in light of the "factors" the high court discussed in *Penn Central Transp. Co. v. New York City* and subsequent cases. *Penn Central* emphasized three factors in particular: (1) "[t]he economic impact of the regulation on the claimant"; (2) "the extent to which the regulation has interfered with distinct investment-backed expectations"; and (3) "the character of the governmental action." *Penn Central Transp. Co. v. New York City* (1978) 438 U.S. 104, 124. Subsequent cases, as well as a close reading of *Penn Central*, indicate other relevant factors such as whether the regulation affects the existing or traditional use of the property and thus interferes with the property owner's "primary expectation" (*id.* at 125, 136), and whether the regulation "permit[s] the property owner] . . . to profit [and] . . . to obtain a 'reasonable return' on . . . investment." *Id.* at 136. Under these factors, regulations which significantly limit the uses of private property constitute a taking. Such changes require just compensation, as well as due process and public consultation. This is true, for example, of zoning ordinances which render an existing use nonconforming.

In addition, the United States Supreme Court has definitively established that a land use regulation "goes too far"—amounting to a facial taking of property—where it "denies an owner economically viable use of his land." *Lucas v. SC Coastal Council* (1992) 505 U.S. 1003, 1016, citing *Agins v. City of Tiburon* (1980) 447 U.S. 255, 260. This occurs where a regulation, by implementation alone, leaves the property owner without "substantial economic use" of the affected property. See *Maritrans Inc. v. U.S.* (2003) 342 F.3d 1344, 1351-52. A facial taking analysis does not require a fact-based probe as set forth in *Penn Central*. Rather, the dispositive inquiry is "whether the mere enactment of the [regulation] constitutes a taking." *Agins*, 447 U.S. at 295, *abrogated on other grounds*; see also *Tahoe-Sierra Pres. Council, Inc. v. Tahoe Reg'l Planning Agency* (2002) 535 U.S. 302, 318.

The Ordinance would give rise to a claim for just compensation by oil well operators and owners as well as royalty holders. The Ordinance would severely restrict the ability of well operators, owners, and royalty holders to use their property and would materially infringe on their property rights and interests, up to and including completely eliminating the value of those rights. Therefore, the Ordinance constitutes a taking for which compensation must be made. The cost of such compensation could run into the hundreds of millions of dollars, if not greater.

The Ordinance constitutes a violation of the vested rights of oil well operators, owners, and royalty holders. Under *Avco Community Developers, Inc. v. South Coast Regional Commission*, (1976) 17 Cal.3d 785 ("Avco"), where a permit holders make an investment in that permit, they possess vested legal rights. Subsequent case law has clearly concluded that the doctrine of vested rights applies to use permits and the activities authorized thereunder. See *Hansen Brothers Enterprises v. Board of Supervisors*, (1996) 12 Cal.4th 533 ("Hansen"). Post-Avco decisions have held that use permits confer vested rights. *HPT IHG-2 Properties Tr. v. City of Anaheim* (2015) 243 Cal. App. 4th 188, 199 (where a CUP has been issued and the landowner has relied on it to its detriment, the landowner has a vested right.); see also *Malibu Mountains Recreation, Inc. v. County of Los Angeles* (1998) 67 Cal.App.4th 359, 367. The scope of the vested rights is the scope of activity authorized under the permit. *Santa Monica*

Pines, Ltd. v. Rent Control Bd. (1984) 35Cal.3d 858, 865. Here, the Ordinance will unlawfully curtail the vested rights related to the oil wells at issue.

6. The proposed ordinance will eliminate jobs and lower the county's tax base

The oil and gas industry pays millions of dollars annual to the county through an Ad Valorem tax on reserves. The county is facing a severe budget deficit, and the loss of millions of additional dollars will only exacerbate the problem. The county will also eliminate high-paying jobs that cannot be replicated by any other industry. 2/3 of all employees in the oil and gas industry do not possess a college degree, but average \$123,000 in salary. There are over 1,400 Santa Barbara County residents directly employed by the oil and gas industry and another 5,000 that depend on the industry, which account for over \$2 billion of economic activity in the county.

7. The proposed ordinance will increase gasoline prices on California drivers

Because Californian refiners pay \$5-\$6 more per barrel for foreign imports than in-state production, the more the state becomes reliant on foreign oil, the higher gasoline, diesel, and jet fuel prices will be.

In conclusion, phasing out oil production in Santa Barbara County will increase greenhouse gas emissions, increase other environmental harms, raise gas prices, put people out of work, exacerbate the county's budget deficit, violate CEQA law, violate federal law, and subject the county to expensive litigation that it will lose. For these reasons, the county would be well advised to pause this action and have a dialogue with industry on a better path forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rock Zierman', with a stylized flourish extending to the right.

Rock Zierman
CEO

Katherine Douglas

From: Rodney Gastil <rodney.gastil@pceclp.com>
Sent: Monday, October 20, 2025 9:21 AM
To: sbcob
Subject: Fw: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Rodney Gastil and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Rodney Gastil

Katherine Douglas

From: Andres Barrios <andres.barrios@pceclp.com>
Sent: Monday, October 20, 2025 9:23 AM
To: sbcob
Subject: Fw: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Andres Barrios and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Andres Barrios

Katherine Douglas

From: Cody Scrivener <cody.scrivener@pceclp.com>
Sent: Monday, October 20, 2025 9:29 AM
To: sbcob
Subject: Fw: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Cody Scrivner and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Cody Scrivner

Katherine Douglas

From: Rodney Gastil <gastilrodney56@gmail.com>
Sent: Monday, October 20, 2025 9:47 AM
To: sbcob
Subject: Fwd: URGENT - SBC OIL & GAS PHASE OUT

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The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Rodney Gastil

Katherine Douglas

From: Jaime Cisneros <jaime.cisneros@pceclp.com>
Sent: Monday, October 20, 2025 10:06 AM
To: sbcob
Subject: NO SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Jaime Cisneros and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Jaime Cisneros

Katherine Douglas

From: Johnny Robinson <jrobinson@pceclp.com>
Sent: Monday, October 20, 2025 10:15 AM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Johnny Robinson and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards Johnny Robinson

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the

protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11.

Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case,'" and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced

with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: John Collier <jcollier@pceclp.com>
Sent: Monday, October 20, 2025 10:42 AM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is John Collier and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards John Collier

Katherine Douglas

From: Josh Cerf <josh.cerf@gmail.com>
Sent: Monday, October 20, 2025 10:58 AM
To: sbcob
Subject: Fwd:

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

I am writing to express strong opposition to the Board's decision to end oil and gas production in Santa Barbara County. While I respect environmental concerns, the economic and practical consequences of this action are too severe to ignore.

Eliminating local oil and gas production threatens thousands of direct and indirect jobs—many of them are skilled positions that support local families. The energy sector has long been a foundational part of our regional economy. The ripple effects of its loss will hit not only industry workers but also small businesses that rely on energy-sector dollars—transportation companies, equipment suppliers, contractors, and service providers will all suffer as spending and demand shrink.

The economic damage doesn't stop there. This decision reduces critical tax revenues that fund schools, emergency services, and infrastructure—burdens that will now fall even more heavily on residents and small businesses. A weakened energy economy diminishes our overall resilience.

Moreover, curbing local production does not reduce demand for oil and gas—it simply shifts the source. This increases our dependence on foreign oil, often extracted under far weaker environmental and labor standards. Shipping in fuel from overseas increases emissions and supply chain risks. Why should Santa Barbara County import what it can responsibly produce right here?

It's also important to recognize that oil and gas are not just fuels—they are essential to the production of over 6,000 everyday items, including plastics, medical supplies, fertilizers, electronics, and countless other products that we rely on regardless of how we power our cars.

Phasing out fossil fuels over time in favor of renewables is a goal many support, but it must be done responsibly, realistically, and without crippling our local economy or jeopardizing national energy security in the process. Ending oil and gas production abruptly does not eliminate our need for petroleum—it merely exports the impacts elsewhere and punishes our own communities in the process.

I urge the Board to reconsider this action and again and reiterate that I strongly oppose the decision to end oil and gas production

Sincerely,

Josh Cerf

--

Josh Cerf

C: 415.717.2481
Santa Barbara, CA

Katherine Douglas

From: tstrickin@aol.com
Sent: Monday, October 20, 2025 11:04 AM
To: sbcob
Subject: Do not end oil and gas production!!

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Chairwoman Capps and Board:

Please note letter below. I am in complete support of Mr. Stoker's and the Santa Barbara County Taxpayer Advocacy Center's position on this very serious subject. Please do not eliminate this industry from our County.

One of your "missions" on your website says "admit mistakes and correct them." I believe trying to eliminate the oil and gas industry in our County has been a mistake and this ordinance will be the ultimate mistake.

Terri Stricklin

Santa Barbara County Taxpayer Advocacy Center
2151 S. College Dr., Suite 101
Santa Maria, CA 93455
(805) 708-9100
www.sbctac.org
MikeStoker@aol.com

"The SBCTAC...Fighting for the Taxpayer and Helping our Businesses Succeed..."

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of

the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

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Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

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Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the

implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11. Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case,'" and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the

County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: Rich Field <Rich.Field@pceclp.com>
Sent: Monday, October 20, 2025 11:12 AM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Rich Field and I'm not a member of SBCTAC, however I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards
Rich Field

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of

dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by

state law because it impermissibly banned “methods of production in existing wells.” *NOPEC*, at 11. Judge Kin found that the City’s ordinance impermissibly “restricts the [State Oil and Gas] Supervisor’s ‘express, statutorily-conferred authority to decide what oil production methods are suitable in each case,’ and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court’s ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

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If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board’s plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City’s costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Rich Field
Senior EHS Manager
Pacific Coast Energy Company LP
1555 Orcutt Hill Road
Orcutt, CA 93455
Cell: (805) 478-2964
Office (805) 937-2576 ext. 3219
rich.field@pceclp.com



START SAFE.....FINISH SAFE!!

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This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Katherine Douglas

From: Rich Field <Rich.Field@pceclp.com>
Sent: Monday, October 20, 2025 11:14 AM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Rich Field, and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,

Rich Field
Senior EHS Manager
Pacific Coast Energy Company LP
1555 Orcutt Hill Road
Orcutt, CA 93455
Cell: (805) 478-2964
Office (805) 937-2576 ext. 3219
rich.field@pceclp.com



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Katherine Douglas

From: Fiscus, Robert <Robert.Fiscus@bakerhughes.com>
Sent: Monday, October 20, 2025 12:12 PM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good Afternoon,

My name is Robert Fiscus and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Thank you,

ROBERT FISCUS

Field Specialist | Baker Hughes

Robert.fiscus@bakerhughes.com | (805) 276-7052

Katherine Douglas

From: Anita Guerrini <nicky553@gmail.com>
Sent: Monday, October 20, 2025 12:39 PM
To: sbcob
Subject: Oil drilling in Santa Barbara County

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors,

I am writing in support of County staff's plan to phase out oil drilling in Santa Barbara County. It is past time to end this practice. Oil and gas operations are dirty, polluting, and are counter to the widespread desire to act against climate change. I lived in Ellwood for many years and know that there is local precedent for phasing out such operations. Moreover, State legislation now empowers Santa Barbara County to ban oil and gas development.

Please take this important step for the future of our wellbeing and that of our children and grandchildren. Santa Barbara County can stand as a shining example to other counties for what can be accomplished for the public good.

Sincerely yours,

Anita Guerrini

Katherine Douglas

From: Alberto Felix <Alberto.Felix@pceclp.com>
Sent: Monday, October 20, 2025 12:48 PM
To: sbcob
Subject: Proposed phase out of permitted oil operations in Santa Barbara County

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Alberto Felix and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,
Alberto Felix

Katherine Douglas

From: Jeremy Martin <jeremy.martin@pceclp.com>
Sent: Monday, October 20, 2025 12:56 PM
To: sbcob
Subject: Fw: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Jeremy Martin and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Jeremy Martin

Jeremy Martin

Diatomite Lead Operator

Pacific Coast Energy Company LP

Orcutt Hill Field

1-(805)-264-9004

jeremy.martin@pceclp.com

Katherine Douglas

From: Mudge, Sam <sam.mudge@bakerhughes.com>
Sent: Monday, October 20, 2025 1:18 PM
To: sbcob
Subject: Oppose - SBC oil &GAs Phase out

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Sam Mudge, and I am writing to express my strong opposition to the Board's efforts to phase out oil and gas operations in Santa Barbara County.

For over a century, the Santa Barbara Country oil and gas has provided well-paying, meaningful employment to local residents, operating under some of the most stringent environmental and safety regulations in the country. These jobs support families, strengthen communities, and contribute significantly to the regional economy.

I respectfully urge the Board to reconsider this legislation. Its implementation would have devastating consequences for the communities you represent and serve.

Sincerely,

Sam Mudge
California Area Manager
Upstream Chemicals
Baker Hughes

M +1 805 276 0600

Katherine Douglas

From: Paasha Mahdavi <paasha.mahdavi@gmail.com>
Sent: Monday, October 20, 2025 1:18 PM
To: sbcob
Subject: SLIDES re: Public Comment for Oct 21 2025 Hearing, File# 25-00921 Agenda # (3)
Attachments: Mahdavi_SBC Oil Slides.pptx

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

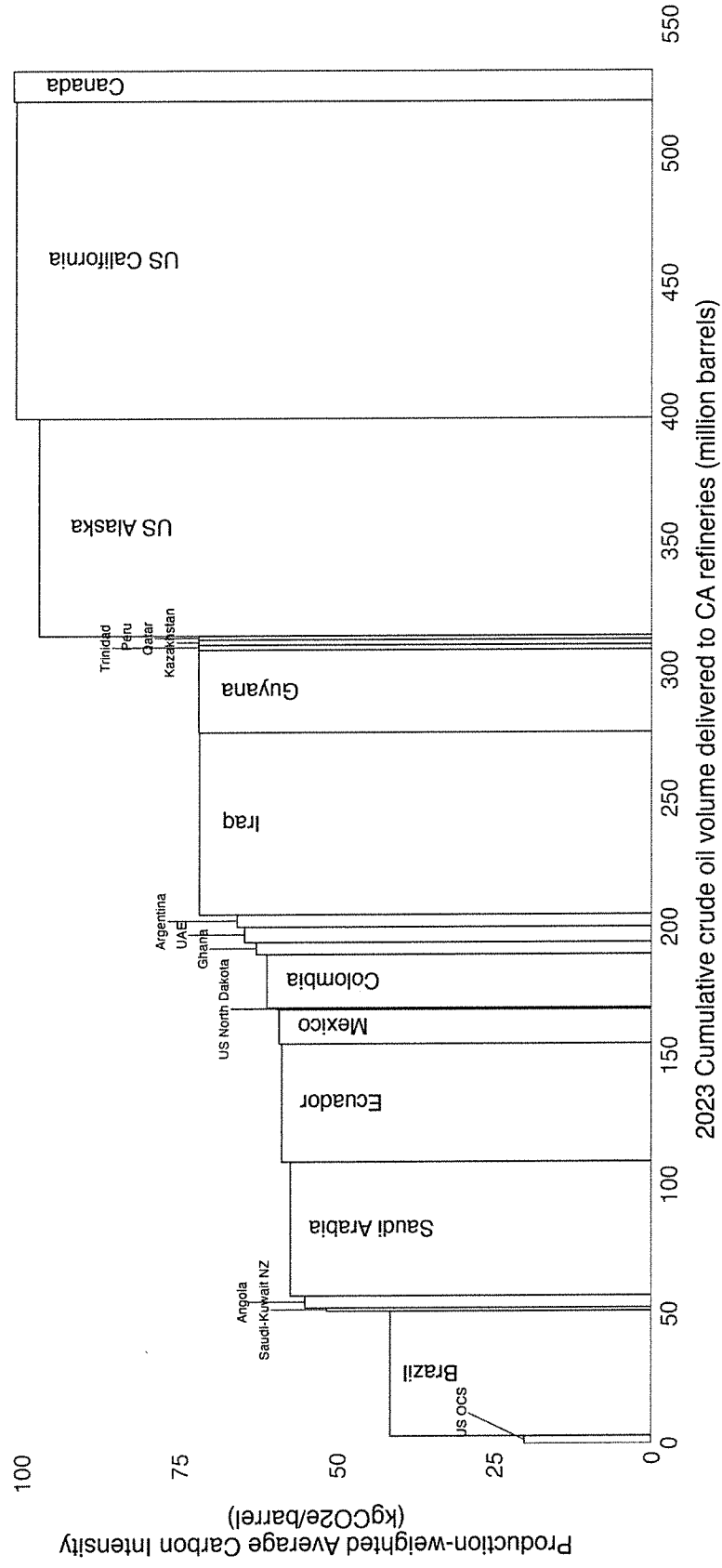
Dear Clerk of the Board,

Please find attached Slides to be projected on the screen during Public Comment for tomorrow's hearing, regarding File # 25-00921, Agenda # (3).

Please confirm receipt of this email and inclusion of the slides in tomorrow's presentation material during Public Comment for the hearing item regarding the framework, approach and budget to phaseout oil & gas operations.

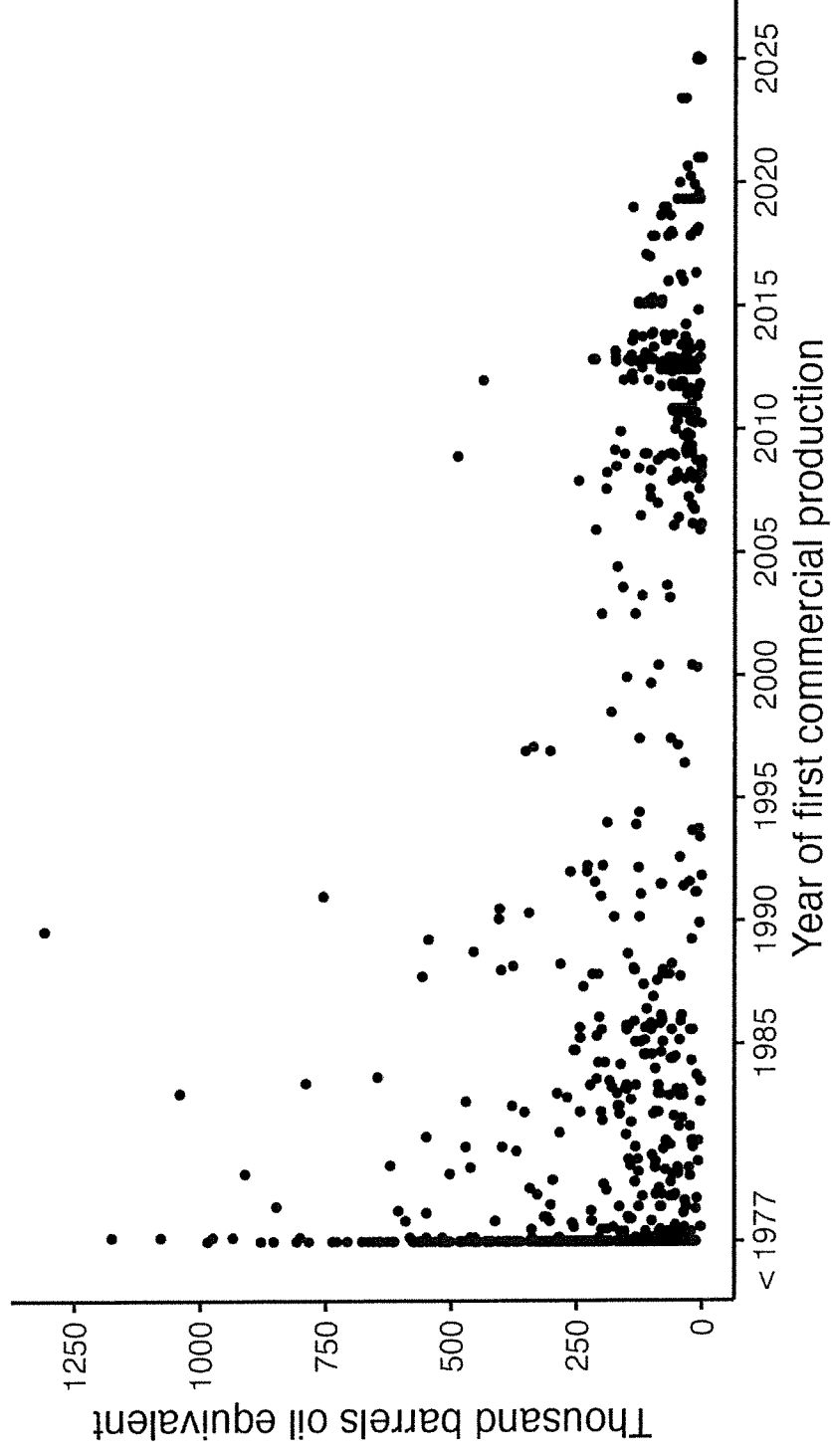
Kindly,
Paasha

In-state oil production is dirtier & costlier than imports



Data: California Air Resources Board

Most oil wells in SB County producing >40 years or >100,000 barrels



Data: California Geologic Energy Management Division (CalGEM)

Katherine Douglas

From: AngelOfTheRisingSun <angelwolfsoul@gmail.com>
Sent: Monday, October 20, 2025 2:00 PM
To: sbcob
Subject: NO to Onshore Drilling

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I'm writing to you about my concerns about more oil drilling on our Coast and in our National Forest. I 100% completely disagree with more oil drilling. Our environment is already under enough attacks. We have enough oil drills at the moment and placing any more on our Coast or Forest is not needed. There have been previous spills and horrible cleanup attempts and total disregard for our environmental laws and standards by those implementing these oil drills. And the pollution that comes along with all of this is a hazard not only to people but to our wildlife and environment. California used to set the highest environmental standards for the rest of the country. I believe we should stand strong and adhere those principles and do what's best for California. No more on shore drilling.

Thank you,
Angel Golis

Katherine Douglas

From: Pete Alcocer <palcocer@oecusa.com>
Sent: Monday, October 20, 2025 2:04 PM
To: sbcob
Subject: The board's efforts to shut down the local Santa Barbara County oil industry.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is (Pedro Alcocer) and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards (Pedro Alcocer)

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the

protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11.

Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case," and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced

with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Pete Alcocer
OEC
307 Roemer Way Suite 300
Santa Maria, Ca 93454
Office (805) 922-4772
Mobile (805) 570-8096

Katherine Douglas

From: Nikki Talebi <nikkitalebi@ucsb.edu>
Sent: Monday, October 20, 2025 2:20 PM
To: sbcob
Subject: Comment on Agenda Item 3

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,

Thank you for hearing the topic of the Santa Barbara County Oil Phaseout. My name is Nikki Talebi and I am a student in UCSB's Environmental Affairs Board. I want to express my gratitude for the Board approving the Oil Phaseout Ordinance.

The economic impact of an oil phaseout would be limited for Santa Barbara, and the benefits of implementing renewable energy would greatly outweigh these impacts. As a future participant in the Santa Barbara workforce, I want a good economy and enough job opportunities, so I have a lot at stake with these decisions and so do all of the students at UC Santa Barbara. I believe that timely and specific oil phaseout policy is a necessary change for my future due to the horrible ecological and climate impacts that pumping oil has on the environment. Additionally, about 60% of county residents believe their local officials should do more to address global warming. 56% oppose offshore drilling for oil and natural gas, and 69% believe developing clean energy should be a priority. Santa Barbara County residents strongly believe that you should be developing clean energy, and phasing out offshore oil. It is clear that there are strong opinions about this, and the peoples' needs must be met.

This is why I urge you to prohibit new oil extraction or production facilities, classify existing oil and gas operations as 'nonconforming uses', and commission a workforce development study and program to assist oil and gas industry workers in transition to other sectors.

Thank you for taking the time to hear from your constituents.

Thank you,
Nikki Talebi

Katherine Douglas

From: Rebecca Cerf <rebecca.cerf@gmail.com>
Sent: Monday, October 20, 2025 2:24 PM
To: sbcob
Subject: Oil and gas production

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

I am writing to express strong opposition to the Board's decision to end oil and gas production in Santa Barbara County. While I respect environmental concerns, the economic and practical consequences of this action are too severe to ignore.

Eliminating local oil and gas production threatens thousands of direct and indirect jobs—many of them are skilled positions that support local families. The energy sector has long been a foundational part of our regional economy. The ripple effects of its loss will hit not only industry workers but also small businesses that rely on energy-sector dollars—transportation companies, equipment suppliers, contractors, and service providers will all suffer as spending and demand shrink.

The economic damage doesn't stop there. This decision reduces critical tax revenues that fund schools, emergency services, and infrastructure—burdens that will now fall even more heavily on residents and small businesses. A weakened energy economy diminishes our overall resilience.

Moreover, curbing local production does not reduce demand for oil and gas—it simply shifts the source. This increases our dependence on foreign oil, often extracted under far weaker environmental and labor standards. Shipping in fuel from overseas increases emissions and supply chain risks. Why should Santa Barbara County import what it can responsibly produce right here?

It's also important to recognize that oil and gas are not just fuels—they are essential to the production of over 6,000 everyday items, including plastics, medical supplies, fertilizers, electronics, and countless other products that we rely on regardless of how we power our cars.

Phasing out fossil fuels over time in favor of renewables is a goal many support, but it must be done responsibly, realistically, and without crippling our local economy or jeopardizing national energy security in the process. Ending oil and gas production abruptly does not eliminate our need for petroleum—it merely exports the impacts elsewhere and punishes our own communities in the process.

I urge the Board to reconsider this action and again and reiterate that I strongly oppose the decision to end oil and gas production

Sincerely,

Rebecca Cerf

Katherine Douglas

From: Carrie <clfernandes9319@gmail.com>
Sent: Monday, October 20, 2025 2:48 PM
To: sbcob
Subject: Public comment for agenda Item 3

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Santa Barbara County Board of Supervisors,

I strongly support phasing out oil production in Santa Barbara County. Continuing to extract oil here threatens our coast, air quality, and the health of our communities. Oil spills and pollution endanger the natural beauty and biodiversity that define this region, while locking us into a declining and polluting industry.

Phasing out oil is an opportunity to lead with our values—protecting public health, advancing California's climate goals, and supporting workers through a just transition into clean energy and restoration jobs. Santa Barbara helped spark the modern environmental movement more than fifty years ago, and now we can once again lead the way toward a cleaner, safer, and more resilient future.

Sincerely,
Carrie Fernandes

Katherine Douglas

From: Kenny Wallravin <kennywallravin@gmail.com>
Sent: Monday, October 20, 2025 2:52 PM
To: sbcob
Subject: Oil phase out

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the board of supervisors of SB county . I am writing in regards to the vote tomorrow on phasing oil out of SB County. Please vote no ! Lots of jobs depend on oil !

Katherine Douglas

From: Baudelio Lara <baudelio.lara@pceclp.com>
Sent: Monday, October 20, 2025 3:13 PM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Baudelio Lara and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Best Regards,

Baudelio Lara
Pacific Coast Energy Company LP
(805) 937-2576
Baudelio.lara@pceclp.com



Katherine Douglas

From: Mark Rogers Tunnell <markofalawyer@gmail.com>
Sent: Monday, October 20, 2025 3:18 PM
To: sbcob
Subject: Letter
Attachments: SBCOSUPERVISORSLET.doc

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Sent from my iPhone

MARK R. TUNNELL
13210 SOUTHPORT LANE, SUITE #169-D
SEAL BEACH, CA 90740

(562) 607-1471

October 20, 2025

SANTA BARBARA COUNTY
THE BOARD OF SUPERVISORS,

sbcob@countyofsb.org

CHAIRWOMAN CAPPAS AND HONORABLE BOARD MEMBERS:

The last time I addressed the Board of Supervisors, in October, 2014, I stood among the first wave of cautionary speakers opposing Measure P, during the public hearing against the gas and oil shutdown, in downtown Santa Barbara.

It seems like yesterday, in as much as the Board, since then, has not fully taken time to understand the historic benefits that safe and responsible local oil extraction provides for citizens of the county.

But more importantly, by its present consideration of an oil drilling ban, the Board again refuses to acknowledge two points of law set forth briefly below:

1. The state grants statutory authority with CalGEM, not the Board, to make decisions regarding continued drilling on county land (See Public Resource Code Sect. 3106(d)). As I stated in October, 2014, Board action which terminates drilling could ultimately lead to nearly endless California Supreme Court litigation against the Board-- based on violations of CalGEM's preemptive powers. The cost to defend the Board's action could run to millions of dollars in taxpayer money before it's over. The legal answer looks unavoidable: statewide energy concerns cannot be diversely assumed by a patchwork of competing individual county Boards. CalGEM must be the controlling stabilizing authority.
2. Since 1791, the Fifth Amendment of the US Constitution grants a remedy for governmental action (read "Board action") that deprives (or "takes") the property, or property interests, of persons without due process—meaning, *without recourse to a lawsuit*. "Takings" suits in response to an oil/gas extraction ban should reach the US Supreme Court. As I warned in 2014, a flood of these "takings" claims from existing county-wide oil and gas operators and royalty-owners could cost Santa Barbara County billions of dollars in taxpayer money in defense of the Board's acts, and could bankrupt the county, when it pays claim resolution settlements.

Whatever the Board's motivations for voting to stop oil drilling, it should at least contemplate the disastrous legal consequences that await such a vote. Indeed, the Board should consider a measured and economically sound next step.

Very truly yours
Mark R. Tunnell

Katherine Douglas

From: Beth Boyd <bethboyd44@gmail.com>
Sent: Monday, October 20, 2025 3:31 PM
To: sbcob
Subject: October 21 BOS meeting on the Oil Phase Out ordinance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors:

I am an 80 year old resident in District 1. Roy Lee is my Supervisor. I have enjoyed the glories of this County and want everyone to be able to know the clean air, water, healthy life available here. What we do here affects all living things, as we are all connected. What you do about oil drilling matters here and globally.

Thank you all for considering an oil phaseout ordinance that prohibit new drilling and phases out oil operations. I join with many, many environmental organizations urging you to act now, today, to get oil out of our County.

Sincerely,
Elizabeth Boyd
1323 Plaza de Sonadores
Montecito CA 93108

Katherine Douglas

From: Don Jansma <Don.Jansma@pceclp.com>
Sent: Monday, October 20, 2025 3:32 PM
To: sbcob
Subject: Fw: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Don Jansma and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Don Jansma

Katherine Douglas

From: Isabel Lara <ilara@calm4kids.org>
Sent: Monday, October 20, 2025 3:34 PM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Isabel Lara and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Best Regards,

Isabel Lara

Mental Health Specialist | Child Forensic Interviewer

210 E. Enos Dr. Ste. A | Santa Maria, CA 93454

805.260.3655 | 805.614.9160 | 805.614.9363 fax

<http://calm4kids.org/>



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Katherine Douglas

From: justine guggia <jguggia@gmail.com>
Sent: Monday, October 20, 2025 3:45 PM
To: sbcob
Subject: Santa Barbara county oil and gas

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Justine Jokela and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,
Justine Jokela

Katherine Douglas

From: Patty Martin <pattyd559@gmail.com>
Sent: Monday, October 20, 2025 3:50 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is **Patty Martin** and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards, **Patty Martin**

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of

dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by

state law because it impermissibly banned “methods of production in existing wells.” *NOPEC*, at 11. Judge Kin found that the City’s ordinance impermissibly “restricts the [State Oil and Gas] Supervisor’s ‘express, statutorily-conferred authority to decide what oil production methods are suitable in each case,’” and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court’s ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to “supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case.” Pub. Resources Code § 3106(b). AB 3233 doesn’t negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State’s hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor’s duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board’s plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City’s costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC
Thank you,
Patty Martin

Katherine Douglas

From: Dan Cerf <danocerf@gmail.com>
Sent: Monday, October 20, 2025 3:50 PM
To: sbcob
Subject: Fwd:

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

I am writing to express strong opposition to the Board's decision to end oil and gas production in Santa Barbara County. While I respect environmental concerns, the economic and practical consequences of this action are too severe to ignore.

Eliminating local oil and gas production threatens thousands of direct and indirect jobs—many of them are skilled positions that support local families. The energy sector has long been a foundational part of our regional economy. The ripple effects of its loss will hit not only industry workers but also small businesses that rely on energy-sector dollars—transportation companies, equipment suppliers, contractors, and service providers will all suffer as spending and demand shrink.

The economic damage doesn't stop there. This decision reduces critical tax revenues that fund schools, emergency services, and infrastructure—burdens that will now fall even more heavily on residents and small businesses. A weakened energy economy diminishes our overall resilience.

Moreover, curbing local production does not reduce demand for oil and gas—it simply shifts the source. This increases our dependence on foreign oil, often extracted under far weaker environmental and labor standards. Shipping in fuel from overseas increases emissions and supply chain risks. Why should Santa Barbara County import what it can responsibly produce right here?

It's also important to recognize that oil and gas are not just fuels—they are essential to the production of over 6,000 everyday items, including plastics, medical supplies, fertilizers, electronics, and countless other products that we rely on regardless of how we power our cars.

Phasing out fossil fuels over time in favor of renewables is a goal many support, but it must be done responsibly, realistically, and without crippling our local economy or jeopardizing national energy security in the process. Ending oil and gas production abruptly does not eliminate our need for petroleum—it merely exports the impacts elsewhere and punishes our own communities in the process.

I urge the Board to reconsider this action and again and reiterate that I strongly oppose the decision to end oil and gas

To the Santa Barbara County Board of Supervisors,

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I urge the Board to reconsider this action and again and reiterate that I strongly oppose the decision to end oil and gas production

Sincerely,

Josh Cerf

--

Josh Cerf

C: 415.717.2481
Santa Barbara, CA

Katherine Douglas

From: Mike Griffo <mike.griffo@pceclp.com>
Sent: Monday, October 20, 2025 3:51 PM
To: sbcob
Subject: Do not shut down oil production.

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Michael Griffo and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards Michael Griffo

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the

protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

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Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by state law because it impermissibly banned "methods of production in existing wells." *NOPEC*, at 11.

Judge Kin found that the City's ordinance impermissibly "restricts the [State Oil and Gas] Supervisor's 'express, statutorily-conferred authority to decide what oil production methods are suitable in each case,'" and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court's ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced

with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: Jo <joelenewiggins@gmail.com>
Sent: Monday, October 20, 2025 3:52 PM
To: sbcob
Subject: Oil and gas operations in SB

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Joelene Wiggins and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards
Joelene Wiggins

Katherine Douglas

From: Jenna Woodruff <jennawoodruff27@gmail.com>
Sent: Monday, October 20, 2025 3:54 PM
To: sbcob
Subject: Impact of Oil and Gas Industry

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Jenna Woodruff, a life long Santa Barbara County resident. I am writing to voice my opinion strongly opposing the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid, meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,

Jenna Woodruff

Katherine Douglas

From: Johanna Escobar <johanna.escobar@pceclp.com>
Sent: Monday, October 20, 2025 3:55 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Johanna Rodriguez Escobar, and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards,

Johanna Rodriguez Escobar

Field Operations Assistant/Accounts Payable

Pacific Coast Energy Company LP
Orcutt Field
1555 Orcutt Hill Road
Orcutt, CA 93455
Phone: (805) 937-2576 x 3207
Email: johanna.escobar@pceclp.com
apinvoices@pceclp.com

Katherine Douglas

From: Johanna Escobar <johanna.escobar@pceclp.com>
Sent: Monday, October 20, 2025 3:57 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

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To the Santa Barbara County Board of Supervisors

My name is Johanna Rodriguez Escobar and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards Johanna Rodriguez Escobat

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

Option to authorize staff to initiate work on developing an ordinance to prohibit drilling of new oil & gas wells...

I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of

dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

The SBCTAC asks the board to honor the will of the voters and to retain your discretion so that you can decide each project on its own merits and keep open the option that projects that make sense and that your constituents want approved can go forward.

Finally, to move in this direction would be completely contrary to the direction the Governor directed above, which is imperative to the State of California in regards to our energy needs.

Option to initiate work on preparing a Request for Proposals to undertake an amortization study to determine an appropriate period to phase out existing oil and gas facilities/operations...

Needless to say, this option, if pursued, is completely contrary to the direction Governor Newsom has directed.

However, more importantly, this option is nowhere near as attainable as you may have been led to believe, and could, if implemented, subject the county to hundreds of millions of dollars in Taking Claims from all the operators that will certainly pursue damages for the wrongful taking of their vested property rights. If County Counsel is doing their job, they have no doubt advised you in Executive Session of these facts.

To shed a realistic light on this issue and what you are contemplating, I would like to share with you what has happened in the City of Los Angeles and County of Los Angeles that pursued the same option you are considering today. To oppose the City and County efforts, several interested parties opposing the implementation of an amortization ordinance retained the well-respected law firm of Manatt, Phelps & Philips to stop the ordinance from being implemented.

The results of Manatt's efforts have realized the following.

Both ordinances were the subject of expensive and protracted litigation, and as of today, both ordinances have been rescinded and are no longer in effect.

The LA County ordinance was voluntarily rescinded by the county's Board of Supervisors. The City of LA ordinance was voided by LA County Superior Court Judge Curtis Kin. *NOPEC, et al. v. City of Los Angeles*, 23-STCP-00085 (Sept. 6, 2024). Judge Kin ruled that the ordinance was preempted by

state law because it impermissibly banned “methods of production in existing wells.” *NOPEC*, at 11. Judge Kin found that the City’s ordinance impermissibly “restricts the [State Oil and Gas] Supervisor’s ‘express, statutorily-conferred authority to decide what oil production methods are suitable in each case,’” and therefore was implicitly preempted by Public Resources Code section 3106. *Id.*, at 12. In his ruling, Judge Kin relied on the California Supreme Court’s ruling in *Chevron U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 (*Chevron II*), holding that a similar ordinance in Monterey County was likewise preempted. If Santa Barbara County, after wasting hundreds of thousands of dollars in amortization studies, goes forward with its own ordinance, you will face exactly the same preemption issue, as I can guarantee you the interested parties will legally challenge the County of Santa Barbara, just as they have in the City and County of Los Angeles.

Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to “supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case.” Pub. Resources Code § 3106(b). AB 3233 doesn’t negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State’s hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor’s duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board’s plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City’s costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent, and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: johanna rodriguez <jorod01@yahoo.com>
Sent: Monday, October 20, 2025 3:59 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Johanna Rodriguez Escobar and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards Johanna Rodriguez Escobar

Katherine Douglas

From: Chris Guggia <chris.guggia@outlook.com>
Sent: Monday, October 20, 2025 4:00 PM
To: sbcob

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Sent from my iPhone

Chris Guggia . Chris. Guggia@outlook.com

Do not shut down

Katherine Douglas

From: johanna rodriguez <jorod01@yahoo.com>
Sent: Monday, October 20, 2025 4:00 PM
To: sbcob
Subject: URGENT - SBC OIL & GAS PHASE OUT

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To the Santa Barbara County Board of Supervisors

My name is Johanna Rodriguez Escobar and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards Johanna Rodriguez Escobar

Chairwoman Capps & Honorable Board Members,

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Before addressing these two options, I would like to remind the board of the concerns Governor Newsom has expressed regarding California's lack of energy and the concerns for Californians facing gasoline prices of \$8-\$10 a gallon if California does not change course and work with the oil & gas industry to bring domestic sources of oil & gas to California pumps. In his letter dated April 21, 2025, to the Vice-Chair of the California Energy Commission, Mr. Siva Gunda, he specifically stated, "...it is imperative that we continue to ensure a safe, affordable and reliable supply of transportation fuels over the next two decades." (For a copy of the entire letter, click this link: <https://www.gov.ca.gov/wp-content/uploads/2025/05/Newsom-Gupta-Letter-4.21.pdf>)

With that directive by Governor Newsom in mind, I would like to address those two options.

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I respond to this option with a simple question...Why? Why would you want to abdicate your responsibilities and discretion to prohibit you from being able to support an oil or gas project that has nominal environmental impacts, can generate hundreds of jobs, provide the county with millions of dollars in property taxes, and can lead to additional benefits to our local schools and lead to the protection of open space? By retaining your discretion, you can consider all the facts and then make the decision your constituents elected you to make.

Indeed, the voters on several occasions have voted to NOT remove the discretion from the board and opposed efforts to impose a blanket ban on oil & gas development. The voters have expressly stated they want the Board of Supervisors to do their job and consider oil & gas projects like you would any other projects. To adopt an ordinance imposing a blanket ban totally ignores the will of the very same voters who elected you into office.

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Sincerely,
Mike Stoker
President & CEO, SBCTAC

Katherine Douglas

From: RANDY JOKELA <rjmules@aol.com>
Sent: Monday, October 20, 2025 4:02 PM
To: sbcob
Subject: S B Co oil and gas industry

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors,

My name is Randy Edward Jokela and I wish to inform you that I am strongly opposed to the board's efforts to phase out oil and gas operations in Santa Barbara County.

The Santa Barbara County oil and gas industry has been providing well paid meaningful employment for Santa Barbara County residents for well over a hundred years and does so subject to the most stringent regulatory environment possible.

I urge you to reconsider this ill-advised and unnecessary legislation which would be devastating for the communities that you serve.

Regards

Randy Edward Jokela

Katherine Douglas

From: Libby Rodriguez <libby.rodriguez@pceclp.com>
Sent: Monday, October 20, 2025 4:05 PM
To: sbcob
Subject: SBC OIL & GAS PHASE OUT

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara County Board of Supervisors

My name is Libby Rodriguez and whilst I'm not a member of SBCTAC I wish to endorse their letter below and express my strong opposition to the board's efforts to shut down the local Santa Barbara County oil industry.

Regards, Libby Rodriguez

Chairwoman Capps & Honorable Board Members,

On behalf of our over 350 members of the SBCTAC, our organization is strongly opposed to the board's efforts to end oil and gas production in Santa Barbara County. While this may be politically popular for several of the board members, it is bad public policy, contrary to the direction Governor Newsom has recently urged the state to support, and will subject the county to potentially hundreds of millions of dollars in financial exposure as a result of the litigation that is certain to take place if you adopt the options before your board.

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Under Public Resources Code Section 3106(d), *et seq*, the state has vested **complete** authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code § 3106(b). AB 3233 doesn't negate this express vesting of authority in the State. The County cannot circumvent the preemption issue by relying on AB 3233. The Legislature cannot, and has not, made Public Resource Code section 3106 inoperative, nor has it taken the issue out of the State's hands. Judge Kin, and the California Supreme Court in *Chevron II*, found that the Supervisor's duty to regulate hydrocarbon extraction and methods and practices was a matter of **statewide** concern. (This is consistent with exactly what the Governor has directed!) Thus, the Legislature cannot remove jurisdiction over the matter and assign it to cities or counties, as it has improperly attempted to do with AB 3233.

If the Board of Supervisors chooses to move forward with the proposed ordinance, the industry will sue, and the law will be overturned – at significant cost to the County.

In addition to the preemption issue discussed above, the Board's plan to initiate an amortization study to determine an appropriate phase-out process for oil and gas operations in the county is fraught with risk. First, as the Board is well aware, such a study will itself cost hundreds of thousands of dollars. However, those hundreds of thousands of dollars do not guarantee that the results of the study will protect the County. As just one example, the City of LA conducted three (3) separate studies, which all reached somewhat different conclusions and still left significant analytical gaps, including the failure to consider transfer of ownership costs, costs of regulatory compliance, or ongoing capital investment, and significant assumptions about operating costs, plugging and abandonment costs, and price forecasts. These major omissions and faulty assumptions leave the City's costly amortization studies open to legal attack, while doing nothing to protect the City from inverse condemnation and takings claims by operators who contest the amortization timelines the studies produced, if and when they are applied to try to force operators to shut down production.

And ultimately, notwithstanding the preemption issue and all the amortization studies the county may undertake, if your board ultimately adopts and enforces the amortization ordinance, you will be faced

with Taking Claim (5th Amendment) lawsuits by EVERY existing oil & gas operator. These claims will be in the hundreds of millions of dollars that could literally bankrupt the county. Whether or not a taking has occurred will not be decided by you, nor by local judges, nor even the California Supreme Court. It will end up going all the way, if necessary, to the US Supreme Court, which your County Counsel will advise you that the current court and its decisions have been very supportive of the property owner in Taking Claims.

Do you really want to take that risk? The responsible thing to do is to avoid thousands of hours of staff time being wasted and millions of dollars of taxpayer dollars being spent and take no action. Allow the existing oil & gas operators that have vested rights to continue to operate and retain your discretion on a case-by-case basis to decide whether new gas or oil projects should be approved.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

Libby Rodriguez

