

Katherine Douglas

Public Comment - Group 3 # 3



From: Sharon Broberg (slbroberg@gmail.com) Sent You a Personal Message
<slbroberg@grassrootsmessages.com>
Sent: Thursday, October 30, 2025 2:29 PM
To: sbcob
Subject: Deny transfer of permits to Sable Offshore

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 am afraid that this company does not have the ethics or the bank account to take care of a spill.

Dear Supervisors,

Please DENY the transfer of permits to Sable.

Sable has not demonstrated the skills, training, and financial resources to operate safely and responsibly, especially in light of \$18 million in fines and 21 criminal charges filed against the company.

Sable has proven to our community time and time again it cannot be trusted to operate these facilities safely or responsibly.

Sincerely,

Sharon Broberg
PO Box 41339
Santa Barbara, CA 93103
slbroberg@gmail.com
(805) 966-7560

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Katherine Douglas

From: Mikayla Sooter <mikaylasooter@ucsb.edu>
Sent: Thursday, October 30, 2025 5:45 PM
To: sbcob
Subject: Sable Pipeline- Vote No

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,

My name is Mikayla Sooter and I am severely concerned about the potential restart of the pipeline owned by Sable Offshore Corp. As many have expressed, we need to protect our ecosystems both in land and water. But aside from the obvious environmental harm Sable has and will continue to cause, the fact of the matter is Sable has declined to comply with the coastal act and has shown direct disregard for legal orders.

Sable is relying on 40 year old existing permits, and basing important projects on a permit from the last century demonstrates severe ignorance and neglect of current information. Sable's actions reflect a record of non-compliance and unsafe operations such as disregarding cease and desist orders, failure to notify lands commissions before conducting testing activities, and more. Through time we gain knowledge about the dangers and effects of projects like these, so new permits and regulations must be created. Additionally, Sable is actively pursuing offshore oil barging, which would violate the terms of the SYU Final Development Permit. We cannot be basing projects off permits neglecting 40 years of new data and research, and we cannot pretend like we do not know what is going on.

As a student at UC Santa Barbara, I live and breathe centered around the natural world. Our lands, mountains, oceans, air, water, etc need to be protected. If Sable's project goes on, our land will continue to be degraded, and our waters will be at risk for future oil spills. Santa Barbara has already experienced two catastrophic emails, we do not need more.

From both an environmental and legal stand point, restarting the pipeline will come with a series of negative externalities. Please protect the safety and future of our Californians by NOT allowing Sable Offshore to restart the pipeline in Santa Barbara County. Thank you for your time.

Sincerely,
Mikayla Sooter

Katherine Douglas

From: rubywedbush@umail.ucsb.edu
Sent: Thursday, October 30, 2025 7:00 PM
To: sbcob
Subject: Comment on 11/4/25 BOS Hearing

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 deeply concerned about the potential restart of the pipeline owned by Sable Offshore Corp. I urge you to deny Sable's application to transfer permits for the Santa Ynez Unit, the POPCO Gas Plant, and the Las Flores pipelines.

Sable Offshore has demonstrated a troubling record of non-compliance and unsafe operations, including:

- Disregarding cease and desist orders
- Failing to apply for necessary permits
- Failing to notify the State Lands Commission before conducting well-testing activities
- Being fined \$18 million for unpermitted and destructive operations
- Facing criminal charges filed by the District Attorney

These are not the actions of a responsible operator.

Furthermore, Sable has not shown that it can afford to cover the cost of cleanup or remediation if — or when — another major spill occurs. The public should never be forced to pay for corporate negligence.

It's also possible that Sable may never restart these facilities and instead end up in bankruptcy. The company has offered no assurance that it could fund the safe decommissioning of its facilities if that happens — leaving our county and coastline at risk.

The Board cannot approve the transfer of permits from Exxon to Sable because Sable has not met the existing permit conditions. The State Fire Marshal recently confirmed that Sable has also failed to meet the requirements for the waiver that would even allow a restart.

For the safety of our communities, environment, and economy, I urge you to protect the future of Santa Barbara County and all Californians by denying Sable Offshore's permit transfer and preventing any restart of these unsafe pipelines.

Thank you for your attention and for standing up for our shared coastline.

Sincerely,

Ruby Wedbush

Katherine Douglas

From: Laura <laura.hamman@gmail.com>
Sent: Thursday, October 30, 2025 8:26 PM
To: sbcob
Subject: Please vote No on permit transfer from Exxon to Sable

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 Santa Barbara County Board of Supervisors,

I don't usually write letters like this or get involved in local issues, but this one feels too important to stay quiet about. I love this county and the coast that makes it so special—places like Gaviota, Refugio, and El Capitan are part of what makes living here feel like a privilege. The idea that Sable Offshore Corp. could restart Exxon's old offshore platforms, onshore facilities, and that same pipeline that spilled oil across our shoreline ten years ago honestly makes my stomach turn.

So I'm writing simply as a resident and neighbor to urge you: please do not approve the transfer of Exxon's oil and gas permits to Sable Offshore Corp.

From what I've read, Sable's track record already tells us everything we need to know. Before they've even been allowed to restart operations, they've been fined \$18 million by the Coastal Commission, sued by the Attorney General for dumping waste into streams and habitats, criminally charged by the District Attorney—including for five felonies—and flagged for safety violations by the State Fire Marshal. Even their own investors have sued them for misleading the public.

If this is how they behave before production begins, how can anyone believe they'll operate responsibly once oil is flowing again? The company clearly lacks the integrity, transparency, and care needed to handle such dangerous infrastructure—especially one that's already caused so much harm.

Our county ordinance specifically says a transfer like this should not be approved if it risks public health or the environment. That seems crystal clear in this case. Sable has not proven that it can protect our community, our businesses, our wildlife, or our coastline. They haven't even shown they can afford to clean up another spill or safely retire these aging facilities. We can't afford to take that gamble again.

I'm not part of any group or organization. I'm just one resident asking you to stand up for what's right and protect the place all of us call home. On November 4th, please deny this permit transfer. Santa Barbara County should never again have to relive the pain and loss of another oil disaster.

Thank you for taking this seriously and for all the hard decisions you face on our behalf.

Sincerely,
Laura Hamman
Santa Barbara

Katherine Douglas

From: Jamie Green <springhead.jg@gmail.com>
Sent: Thursday, October 30, 2025 9:39 PM
To: sbcob
Subject: sable 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.

Supervisors-

Please prioritize our coastal ecosystems and community over offshore drilling! Sable has such a terrible record it's criminal, literally!

Jamie Green
Ventura

Katherine Douglas

From: Nancy Tobin <nbtobin@gmail.com>
Sent: Friday, October 31, 2025 5:15 AM
To: sbcob
Subject: Don't enable Sable!

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 urge you to deny Sable's application to transfer permits for the Santa Ynez Unit, Las Flores Pipelines and onshore processing facilities. Sable's record shows they are unwilling or unable to operate safely.

Nancy Pegues Tobin
Santa Barbara
805.698.9039

Katherine Douglas

From: Golden Sunrise <goldensunrise@icloud.com>
Sent: Friday, October 31, 2025 10:18 AM
To: sbcob
Subject: Deny transfer Exxon's oil and gas permits to Sable Offshore Corp

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 Supervisors;

Please deny Sable's application to transfer permits for the Santa Ynez Unit, Las Flores Pipelines, and onshore processing facilities based on the following facts:

- The County's ordinance (Chapter 25B) prohibits a transfer of permits that would place the environment and public health at risk.
- Sable's record makes clear the company is either unwilling or unable to follow the law and operate safely. Within a mere few months and before even restarting.

The California Coastal Commission fined Sable a record \$18 million penalty;

- The state Attorney General filed a lawsuit accusing Sable of illegally discharging waste into streams and habitats;
- The District Attorney filed 21 criminal charges against the company, including five felonies;
- The State Lands Commission Chair publicly questioned "Sable's willingness to be a transparent operator" due to its "willful disregard for the directives of regulatory agencies";
- The State Fire Marshal sent Sable a notice regarding noncompliance with the State Waiver requirements for the pipelines; and
- Sable's own investors filed a federal lawsuit accusing the company of misleading investors about restarting production to boost its stock price before a public offering.
- Sable has not shown that it has the financial capacity to cleanup an oil spill or abandon the facilities. The Board must require Sable post bonds for the facilities now to ensure the public is not burdened with these costs.

It's clear Sable does not have the skills, training, or financial resources to operate these dangerous oil facilities.

On November 4th the Board of Supervisors has an opportunity to protect our coast and communities. Please do the right thing and deny the permits.

Thank you.

Sheri

Katherine Douglas

From: Drew Hart <quatrecoin@gmail.com>
Sent: Friday, October 31, 2025 10:38 AM
To: sbcob
Subject: Sable Offshore Must Sink --

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,

You have got to be kidding -- this is the most irresponsible company around. I met its CFO in New York at a restaurant earlier this month - a cocky, self assured younger man named Gregory Patrinely (gpatrinely@sableoffshore.com) - he was convinced that his project was necessary, that it would be successful. When I asked him, why seek oil on one of the most special and environmentally sensitive coastlines on the North American continent - why not find it in a lesser place, e.g. Oklahoma, or something? - he claimed it was because this is where the oil is... not in Oklahoma? I said 'Nonsense!' to him, and promised that Santa Barbarans would stop him.

Now it is up to you --

Please deny the transfer of permits to Sable Offshore. Sable has not demonstrated the skills, training, and financial resources to operate safely and responsibly, especially in light of \$18 million in fines and 21 criminal charges filed against the company. Sable has proven to our community time and time again it cannot be trusted to operate these facilities safely or responsibly. Thank you for your consideration. .

Regards,

Drew Hart
601 E. Anapamu St., no. 316
Santa Barbara 93103

434 466-3570

Katherine Douglas

From: Lynda Moore (lyndamoore1@comcast.net) Sent You a Personal Message <lyndamoore1@advocatesmessage.com>
Sent: Thursday, October 30, 2025 4:16 PM
To: sbcob
Subject: Deny transfer of permits to Sable Offshore

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,

Please DENY the transfer of permits to Sable.

Sable has not demonstrated the skills, training, and financial resources to operate safely and responsibly, especially in light of \$18 million in fines and 21 criminal charges filed against the company.

Sable has proven to our community time and time again it cannot be trusted to operate these facilities safely or responsibly.

Sincerely,

Lynda Moore
225 Galaxy Way
Lompoc, CA 93436
lyndamoore1@comcast.net
(805) 294-0666

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Katherine Douglas

From: Kris Burnell <krisburnell@gmail.com>
Sent: Friday, October 31, 2025 11:50 AM
To: sbcob
Subject: Nov 4 board meeting

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 am writing to encourage you, the Board of Supervisors, to deny Sable's application to transfer permits for the Santa Ynez Unit, Las Flores Pipelines, and onshore processing facilities. The County's ordinance (Chapter 25B) prohibits a transfer of permits that would place the environment and public health at risk. **This company has proven to our community time and time again it cannot be trusted to operate these facilities safely or responsibly.** Sable has continuously shown disregard for the law, including ignoring multiple cease-and-desist orders from the California Coastal Commission and digging up sensitive habitats without permits.

Sable's record makes clear they are either unwilling or unable to follow the law and operate safely. Within a mere few months and before even restarting, the California Coastal Commission fined Sable a record \$18 million penalty. The state Attorney General filed a lawsuit accusing Sable of illegally discharging waste into streams and habitats. The District Attorney has filed 21 criminal charges against the company, including five felonies. The State Lands Commission Chair publicly questioned "Sable's willingness to be a transparent operator" due to its "willful disregard for the directives of regulatory agencies". The State Fire Marshal sent Sable a notice regarding noncompliance with the State Waiver requirements for the pipelines and **Sable's own investors filed a federal lawsuit accusing the company** of misleading investors about restarting production to boost its stock price before a public offering.

Sable has not shown that it has the financial capacity to cleanup an oil spill or abandon the facilities. The Board must require Sable post bonds for the facilities now to ensure the public is not burdened with these costs.

It's clear Sable does not have the skills, training, or financial resources to operate these dangerous oil facilities. On November 4th you, the Board of Supervisors, have the opportunity to protect our coast and communities. I implore you to **do the right thing and deny the permits.**

Thank you for your time and consideration of this important matter.

Kris Burnell

Katherine Douglas

From: Rich Tobin <richardb.tobin@gmail.com>
Sent: Friday, October 31, 2025 12:09 PM
To: sbcob
Subject: URGENT REQUEST FOR A NO VOTE on the Transfer of ExxonMobil Coastal Development Permit to Sable Oil & 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.

Date: October 31, 2025

Subject: URGENT REQUEST FOR A NO VOTE on the Transfer of ExxonMobil Coastal Development Permit to Sable Oil & Gas

Dear Supervisors,

I am writing to respectfully and urgently request that you vote **NO** on the proposed transfer of the ExxonMobil Coastal Development Permit to Sable Oil & Gas.

The ongoing responsibility for the safe operation and ultimate decommissioning of the damaged pipeline infrastructure must remain firmly with ExxonMobil. Allowing this transfer creates a risk of absolving the original permit holder from long-term, comprehensive accountability, which is essential given the catastrophic history of coastal oil incidents in our county.

Furthermore, the record of Sable Oil & Gas raises serious questions regarding operational compliance and reliability. The Board has a profound duty to ensure that any company operating critical infrastructure that impacts our environment and public safety has an impeccable history of strict adherence to all local, state, and federal laws. Evidence suggests that Sable has repeatedly demonstrated a pattern of non-compliance and unreliability, making them an unacceptable risk for this permit.

Approving this transfer would signal a diminished commitment to the environmental protection and public welfare of Santa Barbara County residents. For the sake of our coastline and community safety, I urge you to reject the transfer and mandate that ExxonMobil remain the legally and financially responsible entity for the pipeline assets.

Thank you for your time and crucial consideration of this matter.

Sincerely,

Richard B. Tobin

--
Richard B. Tobin
263 Santa Monica Way

Santa Barbara, CA 93109
805-698-6915 (c)
richardb.tobin@gmail.com

Katherine Douglas

From: Paasha Mahdavi <paasha.mahdavi@gmail.com>
Sent: Friday, October 31, 2025 1:59 PM
To: sbcob
Subject: Public Comment for BOS Hearing 11-4-2025 - Re: File No. 25-00942
Attachments: Sable economic analysis (Mahdavi).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.

Dear Clerk,

Please find below a message for Public Comment and an attached Report to be submitted as Public Comment for Tuesday's hearing, regarding File # 25-00942.

Dear Supervisors,

I am writing to urge you all to deny the transfer of permits to Sable Offshore.

Contrary to the company's baseless claims, restarting the Santa Ynez Unit:

- Will not stabilize gasoline prices;
- Will not provide durable, high-quality jobs;
- Will not significantly contribute to county property taxes;
- Will not provide sustainable or "clean" oil to the state;
- Will considerably increase the chances of another environmental disaster;
- Will increase greenhouse gas emissions above and beyond the status quo.

Attached is a report from earlier this year that provides evidence for these claims, largely using data from state agencies and from Sable's own financial materials.

So I strongly urge our County Leadership — who have been a beacon of hope on how counties around the country can transition towards a clean energy future — to vote no on this transfer.

Thank you for your consideration.

Sincerely,
Paasha Mahdavi

Economic analysis of market impacts of resuming oil and gas production from the Santa Ynez Unit

Prepared by Paasha Mahdavi¹

February 2025

Introduction

Sable Offshore Corp (“Sable”) plans to restart oil and gas production from three offshore platforms that comprise the Santa Ynez Unit (“SYU”), located in federal waters off the southern coast of Santa Barbara County. The company claims that restarting the SYU will reduce the need to import foreign oil and that, without SYU production, foreign imports and domestic production will increase.²

An economic analysis shows little evidence to support these claims. By contrast, well-established economic models of oil supply and a statistical evaluation of the SYU show that (1) foreign imports are not likely to increase in the absence of SYU production and (2) restarting oil production will have limited to no impacts on California oil markets through 2045.

The most substantial impacts of restarting the SYU are on emissions: if production resumes, global greenhouse gas emissions are likely to increase by 2.5 million tons of CO₂e, given higher greenhouse gas intensity of SYU oil and gas production compared to the typical blend of crude oil around the world.

¹ Associate Professor and Director of the Energy Governance and Political Economy (EGAPE) Lab at UC Santa Barbara. Mahdavi holds degrees in economics (B.A.), international energy policy (M.A.), statistics (M.S.), and political science (Ph.D.) from Columbia University, Stanford University, and UCLA. Mahdavi is solely responsible for the analysis contained in this report, which does not represent or reflect the positions of the University of California.

² Based on Sable’s statement to the County of Santa Barbara Planning Commission on October 30, 2024: “In our case, we’re gonna be displacing a million barrels a month of foreign-based crude tankering into our ports in LA and San Francisco. The carbon index on the SYU crude is 3.5. You’re displacing Iraq, Iranian, Iraqi crude at 12.6 or Libya... so that’s up to a fourth cleaner fuel. And that’s greenhouse gases. So when we bring the cogen on, that’s already factored into it. So if it’s a global issue then it’s actually a net benefit to the environment by bringing this project back on.”

Video for the statement can be found here, starting at 6:30:32:

https://sbcounty.granicus.com/player/clip/4837?view_id=3&redirect=true

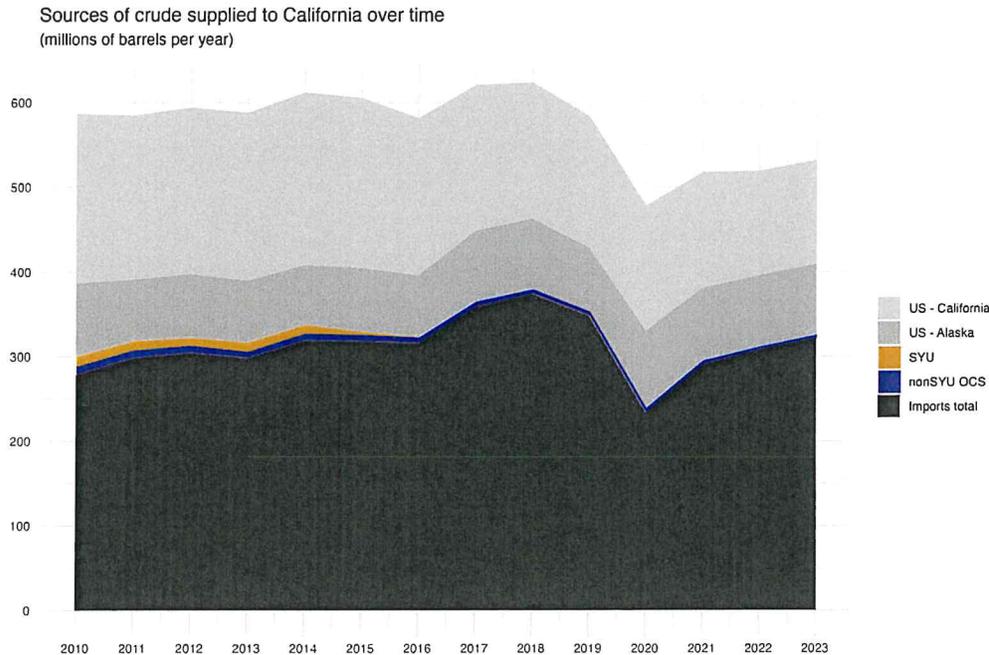


Figure 1: SYU production within overall crude oil supply to California, 2010-23

Author analysis. Data Sources: CARB, Enverus PRISM

SYU production in historical perspective

Production from the SYU averaged 29,000 barrels of oil per day and 27 million cubic feet of gas per day in 2014, the last complete year of production prior to the 2015 pipeline spill and subsequent pause in extraction.³ This is roughly 30% of peak production from the SYU in 1996, consistent with expected depletion of the reservoir.

For the last full year of production, SYU oil supply averaged 1.8% of total statewide crude oil supply, including domestic and foreign imports (Figure 1).⁴ These data also show that crude oil supplied to California has noticeably declined since 2018, reflective not just of the pandemic shock in 2020 but a reduction in consumer demand for petroleum products.⁵

³ Sable Offshore Corp. (2024) *Investor Presentation November 2024*. Accessed in February 2025 from <https://sableoffshore.com/events-and-presentations/default.aspx>.

⁴ CARB, *Major Sources of Crude Supplied to California*. Updated 2024, Accessed in February 2025 from https://ww2.arb.ca.gov/sites/default/files/2024-12/LCFS%20Crude%20Sources_o.xlsx.

⁵ California Energy Commission. (2024). *Report - Draft 2024 Integrated Energy Policy Report Update*.

The SYU pause had no statistical effect on imports of foreign oil

Historical data on oil supply offers an opportunity to assess whether not restarting SYU production would lead to increases in foreign supply, given that markets responded to the loss of production from the SYU in 2015.

Data on crude oil supplied to California refineries from 2010 to 2023 show that domestic supply declined from 2010 to 2023, while imports increased over the same timespan (Figure 1). The primary shift in foreign import supply came during the 2010-2014 period of high prices, as foreign sources of crude exceeded domestic supply in 2011. Aside from a peak in imports in 2017-2019, and the pandemic collapse in 2020, foreign import levels in 2023 were roughly the same as in 2014-2015 (Figure 2).

Looking at the period directly after the SYU went offline, there was no increase in foreign imports: imports actually fell to 316 million barrels in 2016 from 320 million barrels in 2014 and 318 million barrels in 2015.

Applying a statistical model to the data shows that the pause in SYU production since May 2015 did not significantly impact changes in foreign imports despite declining domestic supply. Specifically, using the difference-in-difference estimator widely used in statistics and econometrics,⁶ modeling indicates that the SYU pause caused a modest annual increase in imports by 463,936 barrels per year, though the increase is not statistically distinguishable from a scenario in which the pause had no effect.⁷

To put this number in perspective, all three SYU fields produced roughly 11 million barrels in 2014. Putting these numbers together, for every 1 barrel not produced from SYU fields, there was only a 0.04 barrel replacement by foreign imports to California refineries; the remaining 0.96 barrels to account for the loss of SYU production were offset by reduced demand, and to a lesser extent, increased Alaskan oil supply.⁸

Comparing non-SYU OCS production to imports also shows little impact. Here a model is applied to estimate how changes in non-SYU OCS production influence imports pre/post SYU pause. Results from this model show that declining production from non-SYU OCS had no statistical effect on changes in imports over the 2015-2023 period.⁹

⁶ Abadie, A. (2005). Semiparametric difference-in-differences estimators. *Review of Economic Studies*, 72(1), 1-19.

⁷ The model-estimated increase in foreign imports relative to declining domestic imports is 463,936 barrels per year with a p-value of 0.917, indicating that the difference in imports is not statistically significantly different from 0.

⁸ Based on data from the California Energy Commission, crude oil supply to California from Alaska increased from 70.4 million barrels in 2014 and 73.6 million barrels in 2015 to 84.2 million barrels in 2023, though this increase primarily replaced the loss of crude oil supply from California (onshore and state offshore) over the same period. See footnote 3 for a review of declining consumer demand over time.

⁹ The model-estimated effect on foreign imports relative to declining non-SYU OCS production is 30,237 barrels per day with a p-value of 0.759, indicating that the difference in imports is not statistically significantly different from 0.

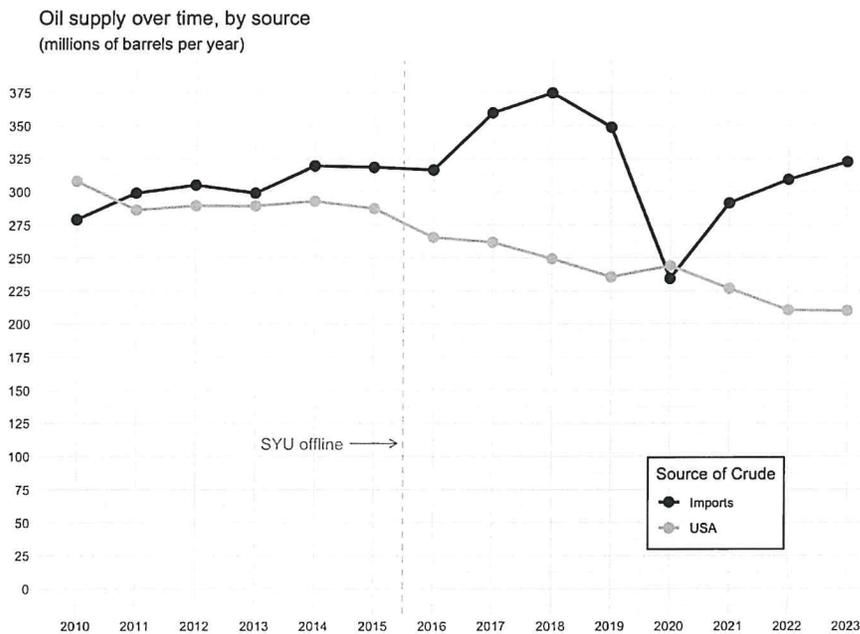


Figure 2: Foreign vs. domestic supply to California before and after SYU pause in 2015
 Author analysis. Data Source: CARB.

Future SYU production will not displace foreign imports on a cost basis

One objection to the above finding would be that SYU barrels would replace production from California onshore fields given SYU’s lower operating costs on a per-barrel basis. Purely from an operating cost and up-front capital cost perspective, the SYU is more cost-competitive than roughly 80% of California’s onshore oil fields using data from a widely-used industry database.¹⁰

These figures are likely underestimated given non-accounting of remediation and retirement costs, which the BSEE estimates to range between \$34,700,743 and \$38,149,826 per platform given the SYU’s platform depths of 850’-1,200’, which are roughly 10 times the remediation costs for onshore California wells on a per-well basis.¹¹

¹⁰ This estimate is a comparison of Sable’s projected costs from the November 2024 Investor Presentation (see footnote 1), and statewide data from Rystad Energy’s UCube. Sable’s projected revenues from a low-estimate base forecast of 133 total MMBoe of oil, gas, and NGL resources give an estimated present value cash flow of \$2.3 billion assuming a 10% discount rate. Backing out operating costs based on Sable’s market price assumptions gives an estimated break-even price between \$41 and \$47 per barrel, depending on assumed depletion rates over a 5-year period. By comparison, the cost curve for California’s onshore and state-water offshore fields projected out to 2030 indicates that roughly 20% of fields have a break-even price below \$44/barrel.

¹¹ Bureau of Safety and Environmental Enforcement and ICF International, *Decommissioning*

Yet even without accounting for retirement costs, SYU's barrels are not more cost-competitive than existing *foreign* suppliers to California. Assuming operating costs of roughly \$44/barrel for SYU,¹² this would still exceed average per-barrel total costs—including capital expenditures, taxes, transport, and administrative costs—for California's top foreign suppliers of oil. This includes Saudi Arabia (\$9/barrel), Iraq (\$11/barrel), Colombia (\$11/barrel), Ecuador (\$7-\$20/barrel), and Brazil (\$21-28/barrel).¹³

This suggests that restarting SYU production would not lead to a reduction in imports on a strictly economic basis.

SYU production will have limited impacts on statewide oil consumption

From a demand perspective, there is limited opportunity cost to consumption for not restarting SYU oil production. This is because there is no “perfect substitution” of supply and demand in global oil markets at the local level: one barrel not produced locally is not perfectly replaced by one barrel produced elsewhere to fill local demand. As a result, a production shock tends to reduce demand despite the relative fungibility of global oil markets.

This pattern particularly holds for oil produced in California, where studies estimate that for every barrel of oil not produced in California, oil consumption declines by between 0.2 and 0.6 barrels.¹⁴ This estimate is consistent with a broad range of economic models from government sources, think tanks, energy consultants, and academic researchers, showing that a one-barrel loss in production corresponds to an average reduction in consumption by 0.5 barrels.¹⁵ Extrapolating these results to the

Methodology and Cost Evaluation. BPA No. E13PA00010. These estimates are based on an assumed 60 wells per platform, which is roughly in line with Sable's development plans given 112 existing wells and 102 infill drilling and step-out opportunities across three platforms.

¹² See footnote 10 for sources on estimated opex at \$44/barrel. Even sell-side models which reflect a lower opex in the \$27/barrel range would show that SYU crude is still not competitive with imports, with the exception of a small range of Brazilian crudes.

¹³ Saudi and Iraqi oil costs are drawn from Rystad Energy; Colombia estimates are from Ecopetrol via the *Rio Times*; Ecuador estimates are from PetroAmazonas via the Baker Institute; and Brazil estimates are drawn from Enverus data on pre-salt breakeven costs, plus an assumed \$3/barrel administrative and transportation cost. For a list of all foreign suppliers to California, see California Energy Commission, *Foreign Sources of Crude Oil Imports to California*, Accessed from: <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/foreign-sources-crude-oil-imports>

¹⁴ Erickson, P. and Lazarus, M. (2018). *How limiting oil production could help California meet its climate goals*. Stockholm Environment Institute discussion briefing report; Erickson, P. and Lazarus, M. (2014). Impact of the Keystone XL pipeline on global oil markets and greenhouse gas emissions. *Nature Climate Change*, 4(9). 778–81.

¹⁵ Wolvovsky, E. and Anderson, W. (2016). *OCS Oil and Natural Gas: Potential Lifecycle Greenhouse Gas Emissions and Social Cost of Carbon*. BOEM OCS Report 2016-065. U.S. Department of Interior, Bureau of Ocean Energy Management; Metcalf, G. (2016). *The Impact of Removing Tax Preferences for U.S. Oil and Gas Production*. Council on Foreign Relations; ICF and Ensys (2014). *The Impacts of U.S. Crude Oil Exports on Domestic Crude Production*,

SYU based on hypothetical production at 10 million barrels per year in 2025, this suggests that on average there would be a 0.93% reduction in annual statewide consumption if production from the SYU is not restarted.¹⁶

Looking at future consumption, there is no support in existing demand models for additional supply needed over time. Modeling by the Institute for Transportation Studies (ITS) shows that under a conservative business-as-usual forecast—based on historical demand and future demand in the absence of new policies—there is an expected 30% decline in fuel consumption, from roughly 19 billion gasoline gallon-equivalent (GGE) in 2020 to roughly 13 GGE in 2045, corresponding to a 1.5% compound annual decline rate.¹⁷ In this scenario, demand is still driven predominantly by petroleum-based fuels, but consumption declines due to efficiency improvements. In more extreme cases with substantial fuel replacement, such as the CARB 2022 Scoping Plan, demand reduction for liquid petroleum fuels declines 94% from 2020 to 2045, for a 10.9% compound annual decline rate.¹⁸

In either extreme—from business-as-usual with no change in statewide policy to a considerable shift in energy policy to achieve carbon neutrality—the impact of the loss of supply from not restarting the SYU is outweighed by declining consumer demand. Instead, it is likely that the over-time economic gains Sable aims to achieve from restarting the SYU will come from exporting the oil from California to other markets.

Restarting the SYU will increase global greenhouse gas emissions

If production were to resume from the SYU, estimates from the Oil Production Greenhouse Gas Emissions Estimator (OPGEE) used by CARB suggest that per-unit emissions from production from the Hondo, Pescado, and Sacate fields would be roughly 87% higher than per-unit emissions from the onshore Aliso Canyon fields in LA

GDP, Employment, Trade, and Consumer Costs. ICF International for the American Petroleum Institute; Bordoff, J. and Houser, T. (2015). *Navigating the U.S. Oil Export Debate*. Columbia University, Center on Global Energy Policy and Rhodium Group; and Rajagopal, D. and Plevin, R. J. (2013). Implications of market-mediated emissions and uncertainty for biofuel policies. *Energy Policy*, 56 75–82.

¹⁶ SYU annual production of 10 million barrels/year is estimated from an expected 28,100 barrels/day production once online, from Sable Offshore Corp. (2024). *Investor Presentation September 2024*, accessed from <https://sableoffshore.com/events-and-presentations/default.aspx>. This is compared to 2023 statewide consumption of 532 million barrels based on CARB data.

¹⁷ Brown, A. L.; Sperling, D.; Austin, B.; DeShazo, JR; Fulton, L.; Lipman, T., et al. (2021). *Driving California's Transportation Emissions to Zero*. UC Office of the President: University of California Institute of Transportation Studies. <http://dx.doi.org/10.7922/G2MC8X9X>.

¹⁸ California Air Resources Board. (2022). *2022 Scoping Plan for Achieving Carbon Neutrality*. Data extracted from: <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx>

County.¹⁹ Existing models of the greenhouse gas intensity of oil and gas production show that these carbon intensity levels are underestimated as they do not capture methane emissions and poorly estimate emissions from flaring.²⁰ Nonetheless, they provide a comparison on an emissions basis to the SYU.

Using Aliso Canyon as an emissions-intensity comparison, the operational emissions intensity of production from the SYU would be roughly 440 kg CO₂e per barrel of oil and barrel-equivalent of gas using the OCI+ metrics of emissions intensity.²¹ This is considerably higher than nearly all other fields rated by OCI+, which typically range between 80 kg CO₂e/mboe and 400 kg CO₂e/mboe. Iraqi crude, for example, has intensities of 175 CO₂e/mboe (Rumaila, medium oil), 234 CO₂e/mboe (Ahdab, medium/heavy oil), and 255 CO₂e/mboe (Fakka, heavy oil), all of which include emissions from production, gathering, storage, and transportation.²²

The quality of SYU crude is a mix of heavy oil (18° API gravity) from the primary reservoir and light oil (37° API gravity) from the secondary reservoir.²³ Comparisons by quality also show that the greenhouse gas intensity of SYU crude exceeds that of commensurate foreign imports. Among heavy oil comparisons, SYU greenhouse gas intensity would be higher than any field rated by OCI+.²⁴ Among light oil comparisons, SYU greenhouse gas intensity exceeds all estimated fields with the exception of four that are not currently exported to California.²⁵

Compared to production from Elk Hills in Kern County—which produces medium/light oil that is near global averages in emissions intensity taking methane emissions into account, and approximately equivalent to SYU barrels in terms of estimated break-even

¹⁹ CARB. (2023). Estimated Carbon Intensity Values for the Crude Lookup Table, App. F to Proposed Amendments to the Low Carbon Fuel Standard Regulations. These values are roughly double what Sable stated at the October 30, 2024, Planning Commission hearing (see footnote 1). The 2010 carbon intensity (gCO₂/MJ) for Hondo, Pescado, and Sacate is estimated at 6.84, 6.13, and 4.85, respectively, with a production-weighted average at 6.09 gCO₂/MJ. This is compared to Aliso Canyon with carbon intensity of 3.26 gCO₂/MJ.

²⁰ RMI, *Oil Climate Index plus Gas Model v.2.1.0* (2024); Mohammad S. Masnadi et al., Global carbon intensity of crude oil production. *Science* 361,851-853 (2018); Scarpelli, T. R., Jacob, D. J., Grossman, S., Lu, X., Qu, Z., Sulprizio, M. P., Zhang, Y., Reuland, F., Gordon, D., and Worden, J. R.: Updated Global Fuel Exploitation Inventory (GFEI) for methane emissions from the oil, gas, and coal sectors: evaluation with inversions of atmospheric methane observations. *Atmos. Chem. Phys.*, 22, 3235–3249 (2022).

²¹ Based on data from the Oil Climate Index plus Gas (OCI+), accessed from <https://ociplus.rmi.org/analysis>. Aliso Canyon is rated at 235.84 kg CO₂e/mboe industry GHG emissions intensity.

²² Ibid.

²³ Based on information for Platform Hondo from: Air Pollution Control District, Santa Barbara County. (April 2024). *Draft Permit to Operate 9100 – R8 and Part 70 Operating Permit 9100: Sable Offshore – SYU Project Platform Hondo*. Accessed in February 2025 from <https://www.ourair.org/wp-content/uploads/Draft-PT-70-09100-R8-Platform-Hondo-4-8-2024.pdf>

²⁴ The highest intensity rated among heavy or extra heavy oil is Canada Peace River at 419 CO₂e/mboe. Data drawn from OCI+ (see footnote 21).

²⁵ The exceptions are industry GHG intensities of 490 CO₂e/mboe (Gabon Koula), 639 CO₂e/mboe (Iran Agha Jari), 806 CO₂e/mboe (Russia Kuyumbinskoye), and 964 CO₂e/mboe (Mexico Teotleco). Data drawn from OCI+ (see footnote 21).

price per barrel—every barrel of oil from SYU would add 245 kg CO₂e above and beyond emissions from barrels from Elk Hills (195 kg CO₂e/mboe). Considering the anticipated annual volume of production, this translates to roughly 2.5 million tons of CO₂e above what would be emitted if the SYU were not producing.

Conclusion

An overview of the economic analysis performed here of the market impacts of production from the SYU finds support for the following three claims:

- (1) Restarting SYU production will not reduce foreign imports, based on both statistical analysis of the 2015 pause and an economic analysis of costs compared to major suppliers of crude;
- (2) Not restarting SYU will not have significant impacts on consumer markets over time, given declining demand for petroleum products in California through 2045 outpaces the loss of supply from SYU production;
- (3) Production from the SYU will increase global greenhouse gas emissions given the higher greenhouse gas intensity of operations compared to industry averages for operations from commensurate fields.

Katherine Douglas

From: Nicolette Reese <nicolettereese@ucsb.edu>
Sent: Friday, October 31, 2025 2:07 PM
To: sbcob
Cc: Simone Pulver
Subject: Sable Offshore Corp

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,

My name is Nicolette Reese, and I am concerned about the potential restart of the pipeline owned by Sable Offshore Corp.

I believe the Board of Supervisors should deny Sable's application to transfer permits for the Santa Ynez Unit, POPCO Gas Plant, and Las Flores Pipelines. It's highly possible there will be another spill from these facilities, and that would be devastating to Santa Barbara County and the Gaviota Coast. Sable likely can't even afford to cover the cost of remediation if/when another major spill occurs — the public should not have to pay to clean up another spill. It's possible that Sable will never restart these facilities, forcing it into bankruptcy. Sable hasn't provided any assurances that it will be able to pay to decommission its facilities in that scenario. The Board can't approve the transfer of permits from Exxon to Sable because Sable hasn't met the conditions of the permits. For example, the pipeline does not have the critical corrosion protection technology required by the permits. Sable has received notices of violations from three state agencies and recently received a second cease-and-desist order from the Coastal Commission for continuing work on its facilities without a proper permit. The questionable behavior of Sable's management team shows that the Board cannot trust them to responsibly operate this project.

Thank you,
Nicolette Reese

Katherine Douglas

From: Peter Smith <rpetersmith@gmail.com>
Sent: Friday, October 31, 2025 2:15 PM
To: sbcob
Subject: Deny permits for Sable

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 deny the transfer of Exxon's permits to Sable Offshore Corp. for the Sant Ynez Unit, Las Flores Pipelines, and related onshore processing facilities. Chapter 2525B of the County's ordinance prohibits a transfer of permits that would place the environment and public health at risk.

Sable has so far operated with reckless disregard for the law - the state Attorney General and the District Attorney have filed numerous criminal charges against them already, and the CCC fined them \$18M. They ignore regulatory agencies.

It's unlikely they have the resources to remediate a large spill or other disaster - shedding resources to inadequately financed operators is a common strategy used by the oil giants to avoid responsibility for their aging assets that carry too much risk. If you permit or they find some other way to legally operate, they must at a minimum provide adequate bonds to cover possible costs.

Thank you.

Richard Peter Smith
220 W Quinto St
Santa Barbara

Katherine Douglas

From: Elisa Moulin <elisamoulin@ucsb.edu>
Sent: Friday, October 31, 2025 2:34 PM
To: sbcob
Cc: Simone Pulver
Subject: Comment on 11/4/25 BOS Hearing

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.

My name is Elisa Moulin, and I am writing about my concern regarding the potential restart of the pipeline owned by Sable Offshore Corp.

I, and many others, are aware that if Sable were to be able to restart the pipeline, another spill is likely to happen. And the devastating impacts of oil spills are numerous and well-known: destruction of habitats, long-term disruption of food chains, poisoning of wildlife, and consequently poisoning of the population. Avoiding the restart of the pipeline is avoiding enormous health hazards to the local population - to students and families. As a student living in Isla Vista, I am worried about my own health and that of my friends being affected, and about the potential damage to the coast's wildlife.

Moreover, Sable has not met the conditions of the permits, so the Board should not be able to approve the transfer of permits from Exxon to Sable. The overall problematic behaviour of Sable should show that trusting the company's management team in responsibly operating this project is unreasonable.

Please protect the health, safety and future of California's inhabitants and wildlife, by NOT allowing Sable Offshore to restart the pipeline in Santa Barbara County.

Sincerely,
Elisa Moulin

Katherine Douglas

From: Jennifer Sahn <jenniferemilysahn@gmail.com>
Sent: Friday, October 31, 2025 2:41 PM
To: sbcob
Subject: Deny transfer of permits to Sable

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,

Please deny the transfer of Exxon's oil and gas permits to Sable Offshore that would allow the company to restart three aging offshore platforms, two onshore facilities, and the same pipeline that failed 10 years ago causing the devastating oil spill on the Gaviota Coast. Sable has not demonstrated the skills, training, and financial resources to operate these facilities safely and responsibly, especially in light of \$18 million in fines and 21 criminal charges filed against the company.

Sable has proven to our community time and time again it cannot be trusted to operate these aging and dangerous facilities safely or responsibly, and that it has no interest in abiding by local or state laws.

Thank you for your consideration.

Sincerely,

Jennifer Sahn
Santa Barbara resident