

**December 6th, 2025**

Santa Barbara County Board of Supervisors  
105 E Anapamu Street  
Santa Barbara, CA 93101

**Re: Santa Barbara Board of Supervisors Meeting - December 16, 2025  
Support for the County's Prepared Findings Affirming Denial of Sable Offshore Corporation's  
Transfer of Owner, Operator, and Guarantor**

Dear Chair Capps and Members of the Board of Supervisors,

My name is Rebeca Adam. I'm a Graduate Student at UCSB's Bren School of Environmental Science and Management, and I'm also a Santa Barbara local. I'm writing to express my support for the Board's vote to recommend the denial of Sable Offshore Corporation's request for a Change in Owner, Operator, and Guarantor for the Santa Ynez Unit (SYU), the Pacific Offshore Pipeline Company (POPCO) Gas Plant, and Las Flores Pipeline System. As a concerned citizen, I urge the board to finalize its denial at the December 16th, 2025, meeting. My position is based entirely on publicly documented records and information, providing substantial evidence that:

1. Sable has repeatedly violated environmental law;
2. Sable has ignored and actively disregarded state directives; and
3. Sable has demonstrated both the inability and unwillingness to safely manage the aging infrastructure.

The Board's November 4th preliminary vote (4-1) to deny the transfer of permits from ExxonMobil to Sable already reflects these concerns (County of Santa Barbara Board of Supervisors, 2025). Sable displays a pattern of behavior that is inconsistent with the responsibilities required of an effective operator overseeing a high-risk coastal energy system. The well-documented conflicts and actions offended by Stable are supported, and the Board's denial is justified and aligned with the County's legal and environmental protection obligations.

**I. Sable Has Repeatedly Violated Environmental Law**

Multiple formal enforcement actions have been taken against Sable for environmental violations. For instance, the Central Coast Regional Water Quality Control Board, with counsel provided by the California Attorney General's Office, filed a complaint against Sable for violations related to the repair and restart of the Santa Ynez. The suit alleges that Sable, despite receiving notice from the Central Coast Regional Water Quality Board regarding permitting

requirements, repeatedly discharged and threatened to discharge unauthorized waste into state waters. Their actions resulted in additional sediment and vegetative debris discharging into sensitive aquatic habitats, impacting the turbidity, nutrient levels, and temperatures. Sable blatantly chose to ignore state environmental regulations and failed to submit information to the Central Coast Water Board that was required by law (State Water Resources Board, 2025).

In addition, the Santa Barbara District Attorney, John Savrnoch, filed an additional 16 misdemeanors, 21 criminal charges, including five felony counts, against Sable on September 18th, 2025, in response to Sable's unauthorized repair work on the ruptured pipeline that caused the 2015 Refugio Oil Spill (Fausey, 2025; Magnoli, 2025). The five felony charges specifically relate to Sable "knowingly" discharging unauthorized debris into sensitive creeks and aquatic habitats, including Nojoqui Creek and Arroyo Quemada. The complaint from the Santa Barbara District Attorney also alleges that repairs to the pipeline were in violation of the California Fish and Game Code and the Water Code (Fausey, 2025).

The alleged violations, resulting in civil and criminal complaints, collectively display Sable's repetitive failure to comply with the environmental regulations that govern coastal pipeline management. Sable's failure to comply with environmental law, with the knowledge of noncompliance, has already resulted in alleged harm to water quality, vulnerable aquatic habitats, and sediment control (State Water Resources Board, 2025). It is therefore imperative that the Board of Supervisors proceed with denying the transfer of operator to Sable. Doing so is a preventive action that will protect Santa Barbara County and our environment from negligent management that could put our coast at unnecessary risk.

## II. Sable Ignored State Directive and Enforcement Orders

Sable has also shown a pattern of disregarding regulatory directives intended to protect sensitive coastal ecosystems and resources. According to the Environmental Defense Center, Sable ignored two cease-and-desist orders issued by the Coastal Commission, resulting in an \$18 million fine and a third cease-and-desist order from the Commission. Despite the regulatory directives and \$18 million fine, Sable continued to work on the pipeline until a Superior Court judge issued an injunction. The Commission noted that the unauthorized work destroyed and disrupted sensitive habitats and species in the coastal zone (Environmental Defense Center, 2025).

Similarly, the Central Coast Regional Water Quality Control Board concluded that Sable deliberately chose to ignore state environmental directives when it continued working on the pipeline, which in turn resulted in harm to the surrounding water quality. The continued excavation and repair operations without proper permits led to sediment discharges into

waterways. These permitting and authorization procedures exist precisely to prevent such impacts and to protect the vulnerable coastal habitats (State Water Resources Board, 2025).

Inside Climate News has reported that California State Fire Marshal Daniel Berlant identified major compliance issues with Sable's proposed restart plan. Fire Marshal Berlant determined that Sable's restart plan could not be approved, as it did not include fixing the corrosion issues that led to the 2015 Refugio oil spill. Despite these findings, Sable continued pushing for reactivation (Bergert, 2025). Sable's push to proceed with reactivation and disregard compliance standards highlights concerns about whether Sable is prepared to operate within the state's pipeline safety directives.

Across these documented cases, Sable has demonstrated a willingness to proceed with high-risk work without required approvals, which is in direct contradiction to state directives and enforcement orders designed to protect the coastal environment and public safety. To secure operator status, an institution must demonstrate the integrity necessary to remain in compliance and perform within existing permitting frameworks. Sable has not shown this, and therefore should not be granted operator status.

### III. Sable has demonstrated both the inability and unwillingness to safely manage the aging infrastructure

The Center for Biological Diversity has noted that Sable has not invested any financial resources toward decommissioning bonds or any other financial assurances associated with the aging Santa Ynez Unit infrastructure. Assurances are standard for operators of offshore oil platforms, facilities, and pipelines, especially those that are associated with spills (Center for Biological Diversity, 2025). Failing to provide assurances creates both short-term and long-term risks for the environment and the public.

To emphasize the importance of safely managing the aging Santa Ynez Unit, Pacific Offshore Pipeline Company Gas Plant, and Las Flores Pipeline System, it is necessary to acknowledge the 2015 Refugio Oil Spill. On May 19th, 2015, approximately 450,000 gallons of oil polluted thousands of acres of shoreline across 150 miles of the California coast. The resulting spill killed hundreds of marine mammals, fish, and birds, in addition to destroying coastal habitats. The Santa Ynez Unit has been shut down for 10 years since the pipeline failed (Center for Biological Diversity, 2025). This history highlights the risks associated with the specific infrastructure, particularly in sensitive environments.

Inside Climate News has reported that Sable pursued offshore storage-and-treating vessel proposals in an attempt to bypass California's pipeline safety requirements. The approach would

revive offshore tankering practices that historically posed significant environmental and safety risks, ultimately resulting in the practices being phased out. Moreover, Sable's proposal did not include fixing the corrosion issues of the previously failed pipeline. By seeking to circumvent necessary corrosion-repair requirements through the use of outdated storage-and-treating vessels, Sable demonstrated an intent to continue relying on compromised infrastructure rather than undertaking essential repairs (Begert, 2025).

These notable financial, operational, and environmental examples indicate that Sable has not shown the competency or the reliability to operate complex, aging oil infrastructure. Their course of action, or lack thereof, has demonstrated an unwillingness and inability to operate the Santa Ynez Unit, the Pacific Offshore Pipeline Company Gas Plant, and the Las Flores Pipeline System.

### Conclusion

Sable Offshore has shown a consistent pattern of environmental law violations, disregard for state directives, and inadequate ability to manage high-risk oil infrastructure. The Board's findings align with the consensus among other state regulatory agents that Sable should not be granted operator privileges of the Santa Ynez Unit, the Pacific Offshore Pipeline Company Gas Plant, and the Las Flores Pipeline System. For these reasons, I strongly support the Board's decision to deny Sable's request for Change of Owner, Operator, and Guarantor.

Sincerely,  
Rebeca Adam

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