11th National OCS Oil & Gas Leasing Program
Bureau of Ocean Energy Management
Federal Register Notice (comment deadline is January 23, 2026)
https://www.federalregister.gov/documents/2025/11/24/2025-20760/notice-of-availability-of-the-11th-national-outer-continental-shelf-oil-and-gas-leasing-draft#open-comment

January 22, 2026

11th National OCS Oil and Gas Leasing Program
Ms. Kelly Hammerle
Bureau of Ocean Energy Management (VAM–LD)
U.S. Department of Interior
45600 Woodland Road,
Sterling, VA 20166-9216

RE: Opposition to New Lease Sales in the Draft Proposed National OCS Oil & Gas Leasing Program from State Legislators

Dear Secretary Burgum,

On behalf of 133 legislators across 32 states and territories, we write in strong opposition to the Department of Interior's proposal to dramatically expand offshore oil and gas drilling in our state and federal waters by offering 1.27 billion acres to the oil and gas industry. It is our belief that any plan to expand oil and gas leases under the 11th National Outer Continental Shelf Oil and Gas Leasing Program will have a detrimental impact on our constituents, the national economy, and the natural environment on which our states rely.

Impact of Offshore Drilling on States

The Gulf Coast
The recommendation to create a new South-Central Gulf of America Planning Area for offshore leasing consideration places the Gulf states at increased economic and environmental risk. April 2025 marked the 15-year anniversary of the largest offshore oil spill in America, Deepwater Horizon, where almost 134 million gallons of crude oil were released into the Gulf over the course of 87 days.[1] Total economic impacts for 2010-2020 of foregone commercial fishing revenue and recreational fishing expenditures of the spill indicated a loss of 25,000 jobs, $2.3 billion in industry output, $700 million in labor income, and $160 million in state and local tax revenues.[2] Tourism is also a major industry for the state of Florida, which previously experienced

[1] NOAA National Ocean Service. (2017, April 20). *Deepwater Horizon: Effect on Marine Mammals and Sea Turtles.* NOAA. Available at https://oceanservice.noaa.gov/news/apr17/dwh-protected-species.html
[2] Murawski, S., et al. (Eds.). (2020). *Effects of the Deepwater Horizon oil spill on human communities: Catch and economic impacts. In Deep oil spills* (pp. 569–580).

steep declines in visitors following previous oil spills. In the months following the disaster, consumers searched 52% less often for Pensacola (FL), 65% less for Gulf Shores (AL), and 48% less for Destin (FL).[3] The value of real estate sales along the Gulf Coast of Alabama saw a 50% decline in the months following the spill.[4]

In 2004, Hurricane Ivan caused the Taylor Energy oil production platform off the coast of Louisiana to collapse. As of May 2025, oil from the well continues to discharge into the open ocean, harming critical marine species and ecosystems. Containment efforts are still ongoing, making the Taylor spill the longest-running oil spill in the nation's history. And this August marked the 20-year anniversary of Hurricane Katrina, where almost 70 offshore oil and gas platforms were damaged or destroyed in the storm, and over seven million gallons of oil leaked into the ground and coastal waterways as a result.[5]

Alaska

Within the draft is a proposal to hold 21 lease sales in Alaska, including the ecologically and culturally significant High Arctic and Bering Strait Program Areas. Expanding offshore drilling into these waters significantly increases the risk of another oil spill, which is especially concerning given cuts to federal agency funding and capacity for oil spill response efforts. If an oil spill occurs where there is no response infrastructure in place, clean-up could prove to be impossible. In this regard, the threat of a spill not only impacts areas where offshore drilling occurs, but also is of concern to states like Alaska where oil tankers traverse remote coastal waters while transporting oil. The 1989 Exxon Valdez oil spill is one such example, where an oil tanker struck the Prince William Sound Bligh Reef, spilling 10 million gallons of crude oil over multiple days.[6] The remote location of the Sound made it difficult for response efforts to occur, and the oil spilled affected 1,300 miles of coastline.[7] The spill also took a major toll on wildlife, killing an estimated 250,000 sea birds, 3,000 otters, 300 seals, 250 bald eagles, and 22 orca whales. Regional salmon and herring fisheries experienced collapse following the spill, impacting fishermen, coastal communities, and consumers.[8] Opening up 21 areas off the coast of Alaska to drilling can have the same devastating consequences as the Exxon Valdez spill.

California

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[3] Oceana. (2019). *Oil spills and tourism don't mix.* Coastal Carolina River Watch. Available at https://coastalcarolinariverwatch.org/wp-content/uploads/2019/06/14Oil-Spills-Tourism-Dont-Mix-Oceana.pdf

[4] Damage Assessment, Remediation, and Restoration Program. (2025, February 26). *Taylor Energy* [Oil spill profile]. National Oceanic and Atmospheric Administration. Available at https://darrp.noaa.gov/oil-spills/taylor-energy

[5] Bureau of Safety and Environmental Enforcement. (2005, January 19). *Hurricane Ivan – Lessons learned*. U.S. Department of the Interior. Available at https://www.bsee.gov/sites/bsee.gov/files/news/hurricanes/press0119.pdf

[6] "Questions and Answers about the Spill". *History of the Spill*. Exxon Valdez Oil Spill Trustee Council. Archived from the original on February 24, 2012.

[7] Shigenaka, Gary (2014). *"Twenty-Five Years After the Exxon Valdez Oil Spill: NOAA's Scientific Support, Monitoring, and Research"* (PDF). Office of Response and Restoration. Seattle: National Oceanic and Atmospheric Administration.

[8] History.com Editors. (2025, May 28). Exxon Valdez oil spill. History. https://www.history.com/articles/exxon-valdez-oil-spiTwenty-eightl

The draft plan also proposes six areas for leasing off of the Pacific Coast for the first time in over 40 years, including the Southern California Program Area, Northern California Program Area, and Central California Program Area, raising concerns for the state's economy, environment, and coastal communities. California's marine economy accounted for $51.3 billion in GDP and $26.7 billion in wages in 2021, representing a vital piece of the world's fourth-largest economy. [9] California's coastlines and waters are also home to critical military installations, key logistics routes, and special-use airspace essential for national security. The risk associated with increased oil and gas development or spills may undermine military readiness and threaten national security.[10] Much like the Gulf and Alaska, California is intimately familiar with the devastating impacts of oil spills. The 1969 Santa Barbara spill was one of the most devastating oil spills in the country, leaking roughly three million gallons of oil over 35 nautical miles and costing the state millions in cleanup costs.[11] The more recent 2015 Refugio oil spill off the coast of Southern California and the 2021 Huntington Beach oil spill serve as stark reminders that oil spills are not just a concern of the past, but persist to this day.

Final Considerations for the Draft Program Proposal

We appreciate the opportunity to provide input on the Draft Program Proposal. It is our belief that the inclusion of new oil and gas lease sales and creation of new Program Areas is unnecessary to meet current or future national energy needs. As evidenced above, accidents do happen with offshore drilling, and no amount of planning or resources can fully mitigate the harm done to coastal fisheries, habitats, tourism, and the economy in the event of an accidental oil spill. The perceived industrial and workforce development benefits associated with offshore oil and gas production pale in comparison to the detrimental human, economic, and marine impacts our states face following oil spills. Considering these threats, we respectfully urge you to consider the aforementioned concerns expressed by state policymakers when finalizing the Draft Program Proposal.

Thank you for your time and consideration.

Signed,

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[9] U.S. Bureau of Economic Analysis. (2025, September 26). *GDP by State.* U.S. Department of Commerce. https://www.bea.gov/data/gdp/gdp-state

[10] Governor's Military Council. (2018, October). *CA state map: Military installations & operational areas* [Map]. State of California. **https://militarycouncil.ca.gov/wp-content/uploads/sites/81/2018/10/CA_State-Map_Updated-OCT-2018.jpg**

[11] Thulin, L. (2019, April 22). *How an oil spill inspired the first Earth Day*. Smithsonian Magazine. https://www.smithsonianmag.com/history/how-oil-spill-50-years-ago-inspired-first-earth-day-180972007/

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