January 22, 2026

Ms. Kelly Hammerle
Bureau of Ocean Energy Management
U.S. Department of Interior
45600 Woodland Road,
Sterling, VA 20166-9216

To Ms. Kelly Hammerle,

The undersigned businesses write to express our firm opposition to the proposed expansion of oil and gas infrastructure in the Draft Proposed 2026–2031 National Outer Continental Shelf Oil and Gas Leasing Program.

Our coastal economies are the economic engine of the nation, thanks to tourism, recreation, and fishing industries, all of which are incompatible with oil and gas infrastructure and their inevitable spills.

If we can ensure clean and healthy marine ecosystems in American waters, these sectors can persist long into the future and support coastal livelihoods and communities for generations to come.

The U.S. Healthy Ocean Economy supports about 2.6 million American jobs and $230 billion in GDP through activities like tourism, recreation, and fishing. In 2021, the marine economy outpaced the national economy in both growth and sales with the tourism and recreation sector alone expanding by close to $50 billion.[1]

In fact, protecting all federal waters from offshore oil drilling would prevent over $720 billion in damages to people, property, and the environment.

[1] https://coast.noaa.gov/data/digitalcoast/pdf/econ-report.pdf

We can't afford to put all this at risk of devastating oil spills.

Time and time again, we have seen just how destructive spills can be. The BP Deepwater Horizon disaster gushed millions of gallons of oil into the Gulf of Mexico. Impacts to the Gulf Coast economy included a loss of over 10 million user days for tourism and recreation, 25,000 jobs, trillions of larval fish and invertebrates killed, and a decrease of nearly $1 billion in seafood sales.[2] [3] [4] Not to mention the untold health impacts on Gulf communities and those involved in the cleanup.[5] It's not a matter of if there will be another oil spill, but when and how severe. Between 2010 and 2022, more than 7,300 oil spills occurred in federal waters.[6] In 2021, the Huntington Beach oil spill in Southern California spilled 126,000 gallons of oil over a 13 square mile area.[7] The spill was a fraction of the size of the Deepwater Horizon disaster and still halted the coastal economy for over a month and had a lasting impact on the surrounding communities. Alaska has also experienced a major oil spill with Exxon's Valdez oil supertanker running aground on Bligh Reef in Prince William's Sound, in 1989 and spilling over 10 million gallons of oil into its waters, coating 1300 miles of coastline. Reports have shown that the total economic loss from the spill was up to $2.8 billion[8]. Our coasts are too delicate and too valuable to risk the addition of such a toxic industry, especially when we know its expansion is unnecessary. According to a 2023 Oceana report, the oil industry currently holds more than 2,000 leases with 75% of the acreage sitting unused.[9] If we want to be the world's energy leader, we must look to the future of energy reliance, not set ourselves up for failure by chasing a dirty and finite resource

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[2] Court C, Hodges AW, Coffey K, Ainsworth CH and Yoskowitz D (2020) Effects of the Deepwater Horizon Oil Spill on Human Communities: Catch and Economic Impacts. In: Murawski SA, Ainsworth CH, Gilbert S, et al., editors In: Deep Oil Spills: Facts, Fate, and Effects. Cham: Springer International Publishing.

[3] NOAA (2016) Deepwater Horizon oil spill: Final Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement. Chapter 4 – Injury to Natural Resources.

[4] response.restoration.noaa.gov/about/media/assessing-impacts-deepwater-horizon.html

[5] https://www.niehs.nih.gov/research/atniehs/labs/epi/studies/gulfstudy

[6] https://www.bsee.gov/sites/bsee.gov/files/2023-08/Performance%20Metrics%202010-2022%20-%20Data%20Tables.pdf

[7] https://response.restoration.noaa.gov/oil-and-chemical-spills/significant-incidents/huntington-beach-oil-spill

[8] History.com, May 28, 2025 https://www.history.com/articles/exxon-valdez-oil-spill

[9] https://usa.oceana.org/wp-content/uploads/sites/4/2023/04/2023-Drilling-Report-DOI.pdf

We urge the Bureau of Ocean Energy Management to take these economic concerns seriously and to prioritize the protection of our coasts and livelihoods by avoiding the unnecessary expansion of oil and gas infrastructure in the upcoming leasing program.

Thank you for the opportunity to submit these comments. We appreciate your consideration.

Sincerely,

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