City of Imperial Beach, California
OFFICE OF THE MAYOR
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January 21, 2026

Ms. Kelly Hammerle
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Submitted via https://www.regulations.gov
Docket ID: BOEM-2025-0483-0001

Re: Comments on the 11th National OCS Oil and Gas Leasing Program – Draft Proposed Program

Dear Ms. Hammerle:

On behalf of the City of Imperial Beach, California, I respectfully submit the following comments for inclusion in the administrative record regarding the Draft Proposed Program (DPP) for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program.

The City of Imperial Beach adopted Resolution 2018-7885 in 2018 that opposes any new offshore oil and gas leasing, drilling, and related exploratory activity in federal and state waters off the Pacific Coastal, specifically near the coastline of Imperial Beach. The 11th National OCS Oil and Gas Leasing Program as proposed conflicts with the City's resolution.

The City of Imperial Beach's natural coastal resources (including the renown Tijuana National Estuarine Research Reserve – one of only 30 such Reserves in the entire US) are essential to overall environmental integrity, public health and economic stability. Our beaches and coastal waters support a local economy that depends on clean ocean waters, tourism, and recreational fishing from the iconic Imperial Beach municipal pier. Offshore oil and gas development presents potential unmitigated risks that could directly and indirectly harm marine ecosystems, further threaten public health, and undermine the future economic vitality of our beachfront community.

Imperial Beach is also home to critical ancillary military installations and operational units whose training, navigation, and mission readiness depend on safe and unobstructed coastal waters and airspace. These military installations include Navy Outlying Landing Field (formerly Ream Field) – a full-time, US Navy flight training and support facility for rotary-winged aircraft squadrons.

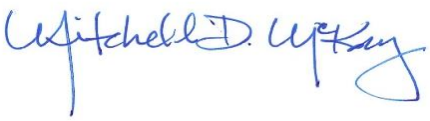
Additionally, directly adjacent to the City of Imperial Beach is the recently constructed Naval Base Coronado (NBC) Coastal Campus, which includes STIC (Seal Team Instructional Complex) - a $1.1B - US Navy Special Warfare training facility. Offshore oil and gas leasing

poses potential risks of vessel conflicts and operational constraints that could impair overall military readiness and national security.

Therefore accordingly, the City of Imperial Beach cannot support the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program to the extent that it does **not** currently include and support permanent protection of San Diego coastal waters from new offshore oil and gas leasing activities.

Thank you for your professional consideration.

Sincerely,



Mitchell D. McKay, Mayor
City of Imperial Beach, CA