January 22, 2026

Submitted via Regulations.gov and mail

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

Re: Docket No. BOEM-2025-0483 (Comments for the 11th National OCS Oil and Gas Leasing Program)

Dear Ms. Hammerle:

On behalf of the County of Los Angeles, the Los Angeles County Chief Sustainability Office (CSO), Department of Regional Planning (DRP), and Department of Beaches & Harbors (DBH) write to express strong opposition to the inclusion of the Southern California Planning Area in the Bureau of Ocean Energy Management's (BOEM) Draft Proposed Program (DPP) for the 11th National OCS Oil and Gas Leasing Program. The proposal to schedule three lease sales in Southern California (2027, 2029, and 2030) stands in blatant disregard to the existing legal, regulatory, and land-use framework of the County of Los Angeles and the State of California.

Our opposition is grounded in critical areas of conflict: (1) the unacceptable risk to our marine life and the "Blue Economy"; (2) the proposal's fundamental incompatibility with our Local Coastal Programs and the Climate Action Plan; (3) the violation of federal and state laws, including the lack of "proper balance" required by the Outer Continental Shelf Lands Act (OCSLA); and (4) conflicts with other federal mandates, including air quality standards and military readiness. We urge BOEM to exclude the Southern California Planning Area from the Final Program.

Marine Life and the Blue Economy

The Southern California Bight is not merely an energy resource; it is a globally significant ecological hotspot and the foundation of Los Angeles County's "Blue Economy."

First, the proposed lease areas overlap directly with designated Biologically Important Areas for the endangered blue whale.[1] The Southern California Bight is one of the most critical feeding grounds in the world for the largest animal on Earth. Introducing industrial noise, vessel traffic, and the risk of oil spills into these feeding grounds violates our custodial responsibility to this species and undermines federal recovery efforts.

[1] Biologically Important Areas for Blue Whales on the US West Coast.

Second, the economic vitality of our region is inextricably linked to a clean coastline. Iconic destinations such as Santa Monica and Malibu rely entirely on their reputation for pristine beaches to attract millions of visitors annually. California's statewide ocean economy generates $51.3 billion in GDP annually, with Los Angeles County alone accounting for 32% of that total.[2] Notably, offshore mineral resources contribute just 5% to the statewide marine economy.[3] A major spill—a statistically significant risk over the life of these leases—would upend this thriving coastal sector, devastating local tax bases and small businesses that depend on the Blue Economy.

Incompatibility with Local Policies

The proposed program conflicts with the local plans and policies of the County of Los Angeles.

Most notably, the Climate Action Plan lays out clear greenhouse gas reduction targets and a long-term goal of carbon neutrality by 2045 for the unincorporated areas of Los Angeles County, committing the region to a fossil-free future.[4] As part of these climate goals, the County and local jurisdictions are actively pursuing strategies to phase out reliance on oil and gas sources and shift toward clean energy, equitable climate action, and reduced pollution. Approving new federal leases that would operate into the 2050s undermines these locally adopted mandates and broader state emissions requirements, effectively trapping the region in carbon-intensive infrastructure precisely when local policy dictates a transition away from extraction.

The County is also exercising its land use authority to prohibit the onshore infrastructure required to support offshore drilling. California Assembly Bill (AB) 3233 (2024) affirms that cities and counties may regulate, limit, or prohibit oil and gas operations within their jurisdictions, including through ordinances banning new drilling and production facilities. Leveraging this clear statutory authority to protect public health and the environment, we are currently amending our General Plan and Zoning Code to prohibit new onshore fossil fuel facilities.[5] In doing so, we join a unified" "Blue Wall" of 27 California jurisdictions that have adopted ordinances effectively precluding the onshore infrastructure required for offshore drilling.[6]

BOEM does not possess the authority to seize local government land or override local zoning for the benefit of private oil companies. Without the allowance of onshore infrastructure, the offshore leases are operationally stranded.

Federal and State Laws and Environmental Priorities

The DPP fails to align with state statutes, federal mandates, and the historic precedent that has governed the Pacific OCS for decades.

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[2] NOAA Office for Coastal Management, 2024 Marine Economy Report: California (2024).
[3] NOAA Office for Coastal Management, 2024 Marine Economy Report: California (2024).
[4] Los Angeles County 2045 Climate Action Plan (2045 CAP).
[5] Los Angeles County Revised Oil Well Ordinance.
[6] California's coastal 'Blue Wall' must rise again to stop new offshore drilling.

The DPP violates the "proper balance" required by Section 18 of the OCSLA, which directs the Secretary of the Interior to develop a National OCS Program that balances resource development, environmental protection, and impacts on coastal zones.[7] The statute requires that this balance consider environmental sensitivity and other factors "to the maximum extent practicable," underscoring that leasing decisions are not solely about expanding oil production, but also about safeguarding marine and coastal environments.[8] The DPP fails this test by arbitrarily targeting the California coast while exempting the Atlantic Coast, the Pacific Northwest, and Florida's waters. By deleting broad swaths of the OCS in those regions while concentrating redundant lease sales in Southern California, BOEM is placing a disproportionate and unjustified burden on our shoreline communities.

Furthermore, the legal landscape in California has shifted decisively against extraction. California Senate Bill (SB) 704 (2024) supports local authority by amending the California Coastal Act to remove the "coastal-dependent" classification for new oil and gas facilities, effectively stripping them of the special permitting considerations they previously enjoyed. SB 834 (2018) prohibits new pipeline easements in state waters.

Historic precedent is also an important consideration. Notably, the federal government has not auctioned new offshore oil leases in the Pacific OCS since 1984, meaning no new drilling rights have been granted off the California coast in over four decades.[9] Some of these state and local policies are in direct response to the environmental harms we have experienced, specifically the 1969 Santa Barbara oil spill, which released millions of gallons of crude into the Santa Barbara Channel.[10] That disaster fouled beaches, devastated wildlife, and suspended commercial fishing and tourism, creating a legacy that underscores the profound risks of offshore development. While there have been periodic attempts to reopen leasing, longstanding public opposition and state actions have effectively kept the Pacific Coast out of recent OCS lease sales. Attempting to reverse over 40 years of bipartisan consensus and protective precedence is arbitrary and ignores the clear will of the affected population.

Federal and Regulatory Conflicts

Finally, the DPP ignores conflicts with other federal priorities unique to this region.

First, the designation of the Chumash Heritage National Marine Sanctuary (effective November 30, 2024) creates a fatal conflict for the proposed program. This new sanctuary federally prohibits new oil and gas exploration, development, and production across 4,543 square miles of the planning area (15 C.F.R. § 922.232(a)(1)).[11] We oppose any attempts to circumvent this protection via "slant" or

[7] Five-Year Offshore Oil and Gas Leasing Program: History and Background | Congress.gov | Library of Congress.
[8] 43 U.S. Code § 1344 - Outer Continental Shelf leasing program | U.S. Code | US Law | LII / Legal Information Institute.
[9] California's hostility to offshore drilling is rooted in past spills - High Country News.
[10] A Spill to Remember: Santa Barbara 1969 - Heal the Bay.
[11] 15 CFR § 922.232.

directional drilling from outside sanctuary boundaries. Such actions would violate the sanctuary's "Enter and Injure" clause (15 C.F.R. § 922.232(a)(2)(iii)),[12]which prohibits discharging material from beyond the boundary that subsequently enters and injures a sanctuary resource. The DPP's failure to account for this massive new federal exclusion zone renders the proposed lease sales in the Central Coast logistically and legally infeasible.

Second, the region faces insurmountable air quality constraints that render any new OCS leasing legally and practically untenable. The South Coast Air Basin is currently classified as in 'Extreme' Nonattainment for all three federal 8-hour ozone standards (1997, 2008, and 2015) and 'Serious' Nonattainment for PM2.5.[13] Under Clean Air Act Section 328 (42 U.S.C. § 7627), OCS sources must comply with the regulations of the Corresponding Onshore Area (COA), which, in this case, is in part the South Coast Air Quality Management District (SCAQMD).[14] Given that the SCAQMD is subject to an EPA 'sanctions clock' for failing to meet existing standards, the region lacks the carrying capacity to absorb any new industrial NOx sources. The DPP fails to demonstrate how new leases could comply with SCAQMD Rule 2005 (New Source Review) and the COA's 'offset' requirements when valid emission reduction credits are virtually non-existent in the basin.[15] Approval of this program would create a direct conflict between two federal mandates: BOEM's leasing goals and the EPA's mandate to protect public health in the nation's most polluted air basin.

Third, the proposed lease areas directly conflict with mission-critical Department of Defense operating areas and the rapidly increasing cadence of commercial and military space launches from the region, specifically from Vandenberg Space Force Base. The Point Mugu Sea Range, which overlaps with the proposed lease blocks, is a unique and irreplaceable asset for naval exercises, weapons testing, and aerospace maneuvers that require large, unobstructed hazard zones. Furthermore, the inevitability of falling rocket booster debris from frequent launches creates a space-use conflict that renders the placement of fixed offshore industrial facilities incompatible with national security and aerospace safety. Just as similar space-use and military conflicts justified the exclusion of the Atlantic Coast and Eastern Gulf of Mexico from previous leasing considerations, these same irreconcilable conflicts exist in the Southern California Bight and necessitate exclusion here.[16]

Finally, unlike other OCS regions, the Southern California Planning Area is defined by its geological complexity and high seismic activity.[17] The proposed lease blocks are intersected by a network of active strike-slip and thrust faults, including the Palos Verdes, Newport-Inglewood, and San Clemente fault zones. Sitting permanent offshore platforms and subsea infrastructure in such a tectonically active environment introduces catastrophic risks that cannot be engineered away. A

[12] 15 CFR § 922.232.
[13] NAAQS/CAAQS and Attainment Status for South Coast Air Basin.
[14] 42 USC § 7627.
[15] SCAQMD Rule 2005 New Source Review for Reclaim.
[16] DoD Mission Compatibility Planning Assessment: BOEM 2017-2022 Outer Continental Shelf (OCS) Oil and Gas Leasing Draft Proposed Program & Gulf of Mexico Energy Security Act of 2006 (Pub. Law 109-432, § 104).
[17] Potential earthquake faults offshore Southern California, from the eastern Santa Barbara Channel south to Dana Point.

major seismic event could trigger seafloor ruptures or submarine landslides, severing pipelines and compromising well integrity at depths where containment and repair operations would be significantly delayed. The DPP fails to adequately account for these unique geohazards, which distinguish the Pacific OCS from the tectonically passive Atlantic or Gulf coasts.

Procedural Deficiencies

We note with significant concern BOEM's failure to hold official public hearings in the affected coastal communities of California. This refusal stifles public due process and ignores the clear legislative intent of OCSLA to ensure transparency and public participation.

Conclusion

CSO, DRP, and DBH request on behalf of the County of Los Angeles that BOEM withdraw the Southern California Planning Area from the 11th National OCS Oil and Gas Leasing Program. The proposal is inextricably conflicted with the "Blue Economy" that drives our region, legally precluded by a network of state and local laws (AB 3233, SB 704, SB 834), and historically unjustified given the 40-year precedent against leasing in the Pacific. We urge the federal government to respect our local authority and our commitment to a sustainable, fossil-free future.

Sincerely,

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