Florida Department of Transportation

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SECRETARY

January 23, 2026

The Honorable Alexis A. Lambert
Secretary
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, FL 32399

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

Dear Secretary Lambert:

This letter outlines the Florida Department of Transportation's comments for the 11th National OCS Oil and Gas Leasing Program, as the program relates to United States maritime activities.

Offshore leasing in Gulf of America (GOA) Area B would not generate significant new commerce opportunities for Florida ports. Offshore production potential is limited, and refining and leasing activity will occur outside the state. The primary implication for Florida seaports is exposure to limited but consequential operational risk, particularly related to spill response and vessel contamination without corresponding economic benefit. Some Florida ports based in the GOA region have provisioning vessels that support a limited proportion of existing offshore energy sectors and will not benefit significantly from increased activity, but business capitalization and impact is up to individual seaports.

The following sections provide background and context for the enclosed comments, GOA maritime activity considerations, risk assessment, and risk impacts related to the proposed federal program.

- **Background for Comments:** GOA Area B is located offshore of Florida's west coast (see Attachment 1), beyond state waters, and within established Gulf transit corridors used by vessels serving Florida's seaports. This assessment evaluates whether the U.S. Department of the Interior's proposed 11th National Outer Continental Shelf (OCS) Leasing Program, specifically the potential leasing of GOA Area B, would impact Florida seaport trade, vessel operations, or port activity. This assessment is limited to maritime commerce, navigation, and operational considerations and does not evaluate environmental policy or leasing decisions more broadly.

- **Offshore Production Context:** Florida is not a major offshore oil- or gas-producing state. Florida also lacks in-state refining capacity; any offshore production would be shipped to out-of-state refineries. As a result, offshore leasing in GOA Area B would not generate

measurable demand for Florida seaport services, energy terminals, or related maritime activity. From a port perspective, offshore leasing would not be expected to increase tanker or barge vessel calls at Florida ports; increase fuel and oil cargo movements; or generate significant new port revenues or port-related employment. Accordingly, Florida seaports would not realize significant direct economic benefit from offshore leasing activity.

- **Seaport Trade and Vessel Traffic Considerations:** Florida's west coast seaports support a high-frequency mix of cargo and cruise vessel activity that relies on safe and predictable vessel access through the eastern Gulf of America. While GOA Area B does not overlap designated port channels, it intersects offshore transit corridors routinely used by vessels serving ports in Florida from Key West to Pensacola.

  Cargo and cruise activity at these ports is driven by existing supply chains and passenger demand, not offshore energy development. In fiscal year 2025 alone, Port Tampa Bay handled approximately 1,871 cargo vessel calls, while SeaPort Manatee handled approximately 566 cargo vessel calls, reflecting steady activity. Cruise activity has also grown significantly, with Port Tampa Bay totaling 1,660,315 passengers served in fiscal year 2025. Offshore drilling activity would largely be served by out-of-state ports and would not materially alter Florida port traffic patterns.

  Automatic Identification System (AIS) data demonstrates cargo routes that traditionally serve Florida's Gulf ports pass through or are adjacent to GOA Area B (see Attachment 1). Between 2019 and 2024, vessels serving Port Tampa Bay and SeaPort Manatee transported more than 51 million and more than 14 million net tons of cargo, respectively, along routes intersecting GOA Area B. These data underscore that GOA Area B is actively used for maritime commerce and leasing activity would not increase trade volumes along these routes.

- **Navigational and Operational Risk Assessment:** Under normal operating conditions, offshore leasing activity in GOA Area B is unlikely to directly obstruct port channels or materially impede vessel access to Florida seaports. Navigational impacts under routine circumstances are expected to be limited.

  However, offshore infrastructure will introduce incremental operational risks, including increased offshore activity in established transit corridors; potential temporary routing adjustments during drilling, maintenance, or response activities; or the need for navigational awareness around fixed offshore structures. While these risks are manageable, they introduce operational complexity without corresponding benefits to Florida's seaport economy.

- **Spill-Related Commerce Impacts:** The primary seaport-related risk associated with offshore leasing is not increased traffic, but increased potential for disruptions arising from spill response and vessel contamination. Even limited oil exposure affects vessel operations. Oil can adhere to vessel hulls during offshore transit without reaching shore. Under U.S. Coast Guard and international pollution control requirements, vessels suspected of oil contamination must undergo immediate inspection and cleaning before continuing operations in U.S. waters. Historical spill response cases demonstrate that vessel decontamination requires a full day or more of cleaning and involves significant cost.

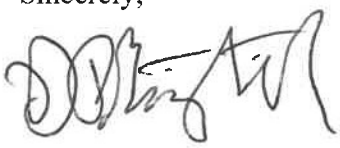
For Florida seaports and American businesses, this can result in temporary loss of vessel availability; missed or delayed vessel transit or port calls; berth congestion and schedule disruptions; or short-term loss of cargo or cruise commerce. Disruptions affecting even a small share of cargo movement could have disproportionate impacts on fuel supply chains and port operations. Importantly, these impacts can occur even in the absence of shoreline impacts or port closures. A single day of vessel unavailability has cascading effects across tightly sequenced cargo and cruise schedules.

The Deepwater Horizon drilling platform explosion in 2010 negatively impacted industries along Florida's Gulf Coast, with regional downturns in sectors feeding into port activity, such as closures of fishing areas in the Gulf and revenue drops for the cruise industry. Economic recovery of tourism and fishing sectors partially rebounded by the mid-2010s, but recovery of jobs in these sectors still lag behind regional employment today.

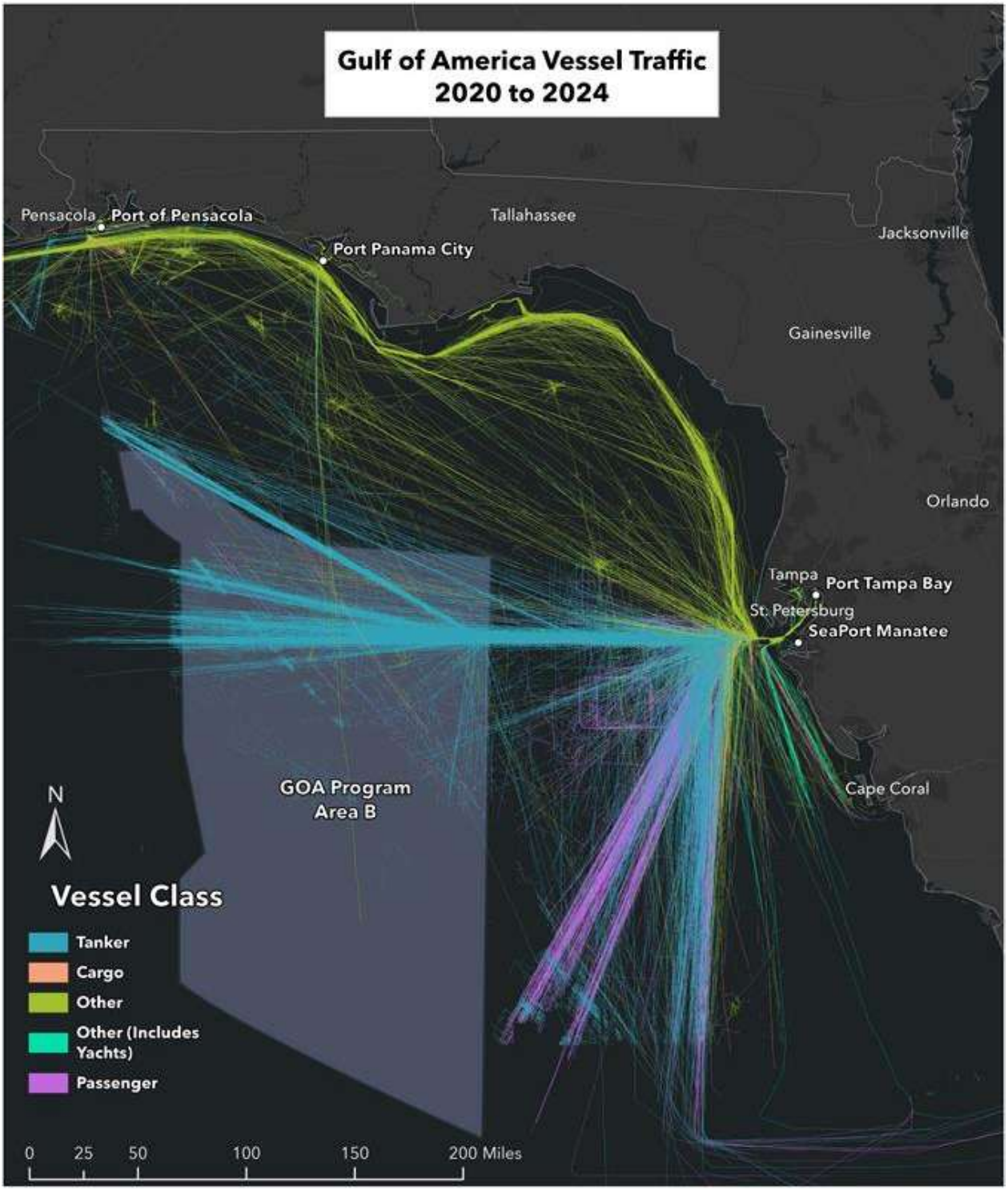
The GOA Area B is situated in and largely bounded by the GOA loop current which swings northward towards the Louisiana, Mississippi, Alabama and Florida Panhandle coast, and wraps around as a semicircle southward towards the Florida Keys and ultimately continues as the Gulf Stream through the Straits of Florida and up into the northern Atlantic Ocean. Therefore, impacts from uncaptured releases would be swiftly spread across shipping lanes and maritime operational areas in the eastern GOA, Straits of Florida and along the eastern coastline of the United States.

From a Florida seaport trade perspective, leasing of GOA Area B under the 11th National OCS Leasing Program would not provide material benefit to Florida's seaport economy. Offshore production potential is limited, refining would occur outside the state, and port activity would not increase substantially as a result of leasing. The primary exposure to Florida seaports is limited but consequential downside risk, primarily associated with spill response, vessel contamination, and cascading operational disruptions. These risks impacts would result in delays; temporary loss of trade; and increased costs to vessel operators, shippers, ports, U.S. businesses and American families. This assessment illustrates that offshore leasing in GOA Area B introduces additional risk to an already heavily utilized maritime system without corresponding economic upside to the state.

Sincerely,



Dan Fitz-Patrick
Chief Strategy Officer, Assistant Secretary

Enclosure: Attachment 1

Attachment 1