FLORIDA DEPARTMENT OF
Environmental Protection

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Ron DeSantis
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January 23, 2026

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

Re: Docket ID: BOEM-2025-0483 – Comments on the Draft Proposed Program for the 11th National Outer Continental Shelf Oil and Gas Leasing Program

Dear Ms. Hammerle:

The Florida Department of Environmental Protection (DEP) has reviewed the U.S. Department of Interior, Bureau of Ocean Energy Management's (BOEM) notice requesting comments on the Draft Proposed Program (DPP) for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program (11th National OCS Program). This new National OCS Program is intended to replace the 2024-2029 National OCS Program that went into effect on July 1, 2024. The State of Florida strongly opposes the inclusion of Program Area B in the DDP and urges BOEM to remove this area from the DDP consistent with President Trump's 2020 Memorandum that prohibits oil and gas lease sales within the majority of the Gulf of America's Eastern Planning Area.

Florida's economy is based upon tourism and other activities that depend on a clean and healthy environment. As a result, we continue to have the nation's best beaches, abundant fisheries and pristine marine waters. Protection of these resources are vital to our communities, economy and military, and provide residents and visitors with recreational opportunities that are unique to Florida.

Governor Ron DeSantis has made environmental protection and water quality improvement a centerpiece of his administration. Through his Executive Order 19-12, as well as his efforts to secure unprecedented levels of state legislative budget support, the Governor has laid out and delivered on a comprehensive strategy for environmental protection.

Florida has long held that no oil or gas drilling should occur off Florida's coasts. Offshore oil and gas drilling is prohibited in state waters as enshrined in Article II, Section 7 of Florida's Constitution. While permittable in certain federal waters, to ensure the highest protections for Florida's waterways, DEP regularly reviews and submits comments to the appropriate federal agencies for activities in federal waters that potentially impact Florida's coastal resources. We appreciate the opportunity to provide comments on this DPP.

The DPP states that an area that is currently unavailable for leasing could still be part of a final National OCS Program but could not be offered for sale until Congress and/or the President, as applicable, makes it available. However, President Trump's 2020 Memorandum, that withdrew areas offshore Florida from disposition by leasing until June 30, 2032, states that the withdrawal prevents the consideration of these areas for any leasing for purposes of exploration or development. Therefore, Florida maintains that the areas included in President Trump's withdrawal cannot be considered in the development of any National Program until after June 30, 2032, or a change in the leasing withdrawal area.

The DPP includes a schedule of 34 lease sales in three of the four OCS Regions, including all or portions of 21 of the 27 OCS planning areas. While we appreciate that sales were not included for the South Atlantic or Straits of Florida Planning Areas offshore of Florida, the Secretary of the Interior intends to create a new South-Central GOA Planning Area, that would divide off portion of the Eastern GOA. Those boundaries would align with the GOA Program Area B being proposed in the DPP. The remaining areas within the current Eastern GOA Planning Area would be removed from further leasing consideration. The DPP includes two lease sales in 2029 and 2030 in the proposed South-Central GOA Planning Area, however this *new* area is still included in the current leasing moratorium in the Eastern GOA Planning Area.

Florida opposes any boundary changes for the Eastern GOA Planning Area. The Eastern GOA has unique ecological and oceanographic features, including the Loop Current along with other prevailing water currents that could direct any oil and gas incidents towards Florida's coastal areas thus negatively impacting Florida's coastal and offshore resources located within all three OCS planning areas off Florida.

A 2020 study of the Deepwater Horizon spill showed the footprint of the oil spill spread wider than originally determined[1]. The study concluded that large areas of the GOA were exposed to invisible and toxic oil, including the West Florida Shelf and Florida Keys via transport by the Loop Current, thus impacting more of Florida's resources than previously measured. The proposal of oil and gas development closer than the Deepwater Horizon blowout puts more of Florida's coastal and offshore resources in harm's way – including those in the other parts of the Eastern GOA, Straits of Florida and the South Atlantic that are not included for leasing.

Additionally, the proposal to create a new planning area (South-Central GOA) would have an impact on the military training activities already established in the Eastern GOA Planning Area. This proposed boundary change could limit the types of training and readiness activities due to a size reduction of the overall training area that is so vital to the training and readiness of our military.

On November 21, 2025, Governor DeSantis issued a statement that this current Department of Interior proposal would weaken protections that Florida worked very hard to establish and the plan could impact ecology of the Gulf and national security.

[1] I. Berenshtein, C. B. Paris, N. Perlin, M. M. Alloy, S. B. Joye, S. Murawski, Invisible oil beyond the Deepwater Horizon satellite footprint. *Sci. Adv.* **6**, eaaw8863 (2020).

Additionally, on December 4, 2025, the Florida congressional delegation sent a letter (attached) urging President Donald Trump to uphold the existing moratorium and keep Florida's coasts off the table for oil and gas leasing. They voiced strong opposition to the attempts to expand offshore oil and gas leasing offshore of Florida's coasts noting that the "new" planning area (South-Central GOA) falls within not only the existing moratorium, but it's also within the Gulf Test Range, a critical military training area used by several military forces along Florida's Panhandle for numerous training and testing activities and is essential to the Department of War to ensure mission readiness. Furthermore, the delegation also enumerated the threat that offshore drilling could and has had to Florida's economy.

Florida is concerned about the potential impacts of OCS oil and gas activities in Florida's marine and coastal environments; the biological resources and critical habitats associated with them; as well as the military activities critical to our nation's security. The summary below addresses some key areas that would be impacted by including areas offshore of Florida for oil and gas exploration and development.

As discussed above, due to prevailing currents, including the Loop Current, any oil and gas incident in the proposed EGOA could pose a threat to all Florida resources. Should any oil spill caught into the Loop Current, it could possibly travel along the West coast of Florida, around the Florida Straits and up the east coast of Florida impacting several unique and sensitive habitats that exist around Florida.

All along Florida's coastal and offshore areas are many ecologically important, unique and sensitive resources including but not limited to sandy beaches; salt marshes; seagrasses; mangroves; the only coral reef system within the continental United States; critical habitat for state and federally listed species (birds, corals, crocodiles, manatees, sea turtle, sharks, whales); artificial reefs; natural hardbottom; coral outcrops; deepwater corals; and protected areas for various fisheries.

The 825 miles of pristine sandy coastline fronting the Atlantic Ocean, the Gulf of America and the Straits of Florida are one of the state's most valuable natural resources. Florida's beaches deserve this status because they serve several important functions, each being vital to maintaining the health of Florida's environment and economy.

The coastal sandy beach system is home to many species of plants and animals dependent upon the beaches, dunes and near shore waters for all or part of their lives. For example, beaches are used by resident and migratory shorebirds for foraging and nesting, and during the summer months, marine turtles come ashore to nest on the beach. Additionally, there are many threatened or endangered plant and animal species within the state that rely on Florida's coastal habitats.

Florida's beaches are a primary attraction for a large portion of tourists that visit the state each year[2]. Both tourists and residents come to the beaches to relax and enjoy the sights and sounds of natural beauty. Others visit the beaches and nearby waters to engage in boating, fishing,

[2] *The recreational and economic value of Florida beaches*, Shore & Beach, Volume 92, Number 3, Summer 2024

diving and other recreational activities. Florida's beaches are an integral part of the state's economy.

Florida invests millions of dollars annually to protect, preserve and manage our valuable sandy beaches and adjacent coastal systems. The beach and dune system is often the first line of defense against storms, absorbing wave energy and reducing the damage to upland structures. The ability to maintain these beach systems is dependent on the increasingly limited sand resources that exist nearshore and offshore of the coast, forcing the use of sand from the OCS. Offshore activities, such as oil and gas development, could impact the quality and quantity of sand available for critically important beach maintenance projects.

Coral reefs are the most complex marine systems on Earth and Florida is the only state in the continental United States to have extensive shallow coral reef formations along its coasts. This reef tract extends for nearly 360 miles from St. Lucie inlet in Martin County to the Dry Tortugas in the Gulf of America and is the third largest barrier reef ecosystem in the world. The Florida Reef Tract contains similar coral formations to those found in the Bahamas and Caribbean Sea. The northern reef tract was designated by the Florida legislature as the Southeast Florida Coral Reef Ecosystem Conservation Area in 2018 and the southern extent of the reef tract lies within the boundaries of the Florida Keys National Marine Sanctuary (FKNMS). The FKNMS encompasses 2,800-square nautical miles that surrounds the entire archipelago of the Florida Keys and includes the productive waters of Florida Bay, the Gulf of America and the Atlantic Ocean. The coral reef communities continue northward in deeper waters along the gulf coast of Florida to the Florida Middle Grounds, a series of submerged pinnacles rising to within 60-80 feet of the surface located about 100 miles northwest of St. Petersburg, Florida.

In recognition of Florida's unique coral reef systems and their importance to the economy, the Florida Legislature enacted the Florida Coral Reef Protection Act (Florida Statute 403.93345) of 2009. Protection of Florida’s coral reefs is essential for ensuring the continued protection of our shorelines, coastal food sources, cultural practices, drug development and biomedical opportunities, and coastal economies that are a direct result of the coral reefs ecosystems of Florida. Additionally, in 2024, Florida designated Florida Coral Reef Ecosystem Conservation Area as the Kristin Jacobs Coral Reef Ecosystem Conservation Area as an aquatic preserve, adding additional protection and awareness to the importance of the coral reefs along Florida’s coast. This new aquatic preserve encompasses state waters offshore southeast Florida stretching 105 miles from the northern boundary of Key Biscayne National Park to the St. Lucie Inlet.

For the past decade, the Florida Reef Tract has been affected by an unprecedented disease outbreak. Beginning in 2014 with isolated diseased coral colonies near Key Biscayne off the coast of Miami-Dade County, the disease outbreak has continued and quickly spread along the Florida Reef Tract and to reefs in the Caribbean. Investigation of the Stony Coral Tissue Loss Disease (SCTLD) found it affects over 20 species of reef-building coral. Research and monitoring efforts have been ongoing since SCTLD was discovered, trying to determine various ways to mitigate and halt the damage being done to the species of reef-building corals that have been affected. This disease outbreak will make the remaining corals and coral reefs more vulnerable and sensitive to any activities that could further impact the health of the reef tract such as oil and gas development activities.

A recent economic report[3] details the significance of tourism to Florida's thriving economy. Florida's tourism provides a significant economic impact supporting jobs, businesses, and contributing to the state's GDP. In 2024, over 143 million visitors contributed roughly $134.9 billion helping generate 7.8 percent of Florida's Nominal Gross State Product and support more than 1.8 million jobs accounting for 1 out of every 8 jobs in the state. Florida's natural environment, including onshore and offshore resources, is a vital factor to our successful tourism economy.

Oil spills can have devastating impacts on Florida's economy. Not only were Florida's natural resources directly impacted by the Deepwater Horizon spill, but the state also dealt with negative publicity affecting tourism statewide as travelers from abroad were unaware that the spill did not affect all the beaches of the state. As a result, approximately 14 percent of gulf coast visitors cancelled their trips to Florida following the oil spill.[4]

There needs to be robust and thorough environmental analyses included in the National OCS Program prior to a Final Program being completed, so possible impacts can be evaluated. The proposed inclusion of part of the Eastern GOA has not been included in previous programs and, thus, has not been included in prior OCS Program environmental impact analyses. Therefore, this proposed program will need a rigorous environmental impact analysis to ensure that Florida's resources will be protected. The proposed National OCS Program should include (1) complete descriptions and evaluations of all aspects of the proposed activities including location, duration, and alternatives; (2) complete characterizations and descriptions of the environmental resources and physical conditions in area, including benthic and water column habitats and coastal habitats potentially affected by OCS activities; (3) a thorough assessment of the potential direct and indirect effects to environmental, cultural, social and economic resources, including benthic habitats, essential fish habitats, fisheries(recreational and commercial), air and water quality, and protected species; and (4) an assessment of the cumulative impacts of the proposed activities in combination with other activities in the vicinity.

OCS activities analyzed should include both routine drilling, production, discharges and transportation activities, as well as (1) effects of blowouts and pipeline ruptures, including those that may occur in deep waters; (2) ability to respond and model spill trajectories related to both deepwater blowouts and pipeline ruptures; (3) fates and effects of permitted and accidental discharges, including the potential for bioaccumulation; (4) the potential of OCS facilities to become vectors for exotic species; (6) the effects of trash and debris generated by OCS activities.

OCS oil and gas exploration, production and related activities have the potential to conflict with Florida's existing coastal and offshore uses including military operations; the nation's space program; recreational activities; marine protected areas; commercial and recreational fishing;

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[3] *The 2024 Economic & Fiscal Impact of Tourism in Florida,* Rockport Analytics, November 2025

[4] *Contract for Analytical Services Related to the Deepwater Horizon Disaster: Estimation of lost indirect and passive use economic values to Floridians*, Food and Resource Economics Department, University of Florida. March 30, 2012.

cruise ships and other vessel traffic; renewable energy uses; aquaculture; and sand or other mineral resources should be also included in any proposal.

As demonstrated by the Deepwater Horizon oil spill in 2010, oil and gas activities can devastate Florida's economy and cause long-term environmental damage. Protecting our coastal resources, enjoyed by both Floridians and visitors from across the world, is a priority for my administration. In 2024, Florida's tourist-based economy, supported by nearly 143 million visitors and contributing more than $134 billion into the state's economy annually, relies on a clean and healthy environment.

Florida opposes the inclusion of any of Florida’s coastal and offshore areas into the National OCS Oil and Gas Leasing Program due to the potential negative impacts of OCS oil and gas activities could have on marine and coastal environments and the biological resources and critical habitats associated with them, as well as the military activities critical to our nation’s security. We will continue to review any information that is released from BOEM and look forward to working with you to ensure long-term protection of Florida’s sensitive natural resources, which are the lifeblood of our economy and quality of life.

Sincerely,

Alexis A. Lambert
Secretary