INTERNATIONAL
MARINE MAMMAL PROJECT
A PROJECT OF EARTH ISLAND INSTITUTE

January 21, 2026

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

Re: Request for Information and Comments on the Preparation of the 11th National Outer Continental Shelf Oil and Gas Leasing Program (Docket no. BOEM-2025-0015)

Dear Ms. Hammerle:

The International Marine Mammal Project (IMMP) of Earth Island Institute is providing the following comments in strong opposition to the proposed Outer Continental Shelf Oil and Gas Leasing Program.

Offshore oil drilling poses many dangers to the marine environment, including whales and dolphins:

- Seismic testing consists of towed powerful air-guns that make ear-piercing noise levels, shot into the ocean bottom. The returning echoes can indicate where oil reserves are present in the underlying sediment. In the meantime, the home of whales and dolphins is filled with huge noise pollution for days on end that can travel for hundreds of miles.
- Once areas are leased to oil companies, drilling can commence. The construction of oil platforms and pipelines, and drilling produce yet more ocean noise. Oil spills on a small scale are regular occurrences.
- Drilling muds, which contain toxic heavy metals and can contaminate large areas of the ocean bottom, are sometimes simply dumped over the side of the drill platform.
- Fracking is now occurring in some offshore areas to increase oil production by injecting a devil's mix of chemicals and hot water to crack sedimentary rocks, allowing the oil to be pumped out. But if any of the fracking fluids should escape the sediments, it could poison large areas of the coast.

- Large-scale oil spills have occurred when things go wrong with offshore oil platforms, pipelines, and tankers, causing billions of dollars in damage to tourism, fisheries, and the marine ecosystems – damage that can last for years. Oil and water do not mix.
- In 1989, when the *Exxon Valdez* tanker crashed into a reef and leaked oil all over Prince William Sound in Alaska, an estimated 2,800 sea otters and as many as 22 orcas died as a result of oil contamination and poisoning.
- The explosion and oil leak of the Deepwater Horizon oil platform, in addition to killing oil workers, also killed, just from March 2010 to July 2014, an estimated 1,141 dolphins and still has adverse impacts to this day on the Gulf of Mexico.
- Many species of endangered whales would be threatened by oil drilling activities, including the North Atlantic right whale, at historically low numbers, the Gulf of Mexico's Rice's whale, and the Eastern Pacific gray whale, now in serious decline and a candidate for relisting under the Endangered Species Act.
- And of course, the burning of oil obtained from offshore contributes to global warming. Oil, gas, and coal must be replaced by green energy alternatives, like solar and wind.

In summary, we believe the administration should be reducing offshore oil drilling and instead emphasizing wind, solar, and other green alternatives to generate energy for the US.

As such, we reject the administration's proposed OCS plan.

Thank you for your consideration of our comments in opposition to the administration's deeply flawed OCS plan.

Sincerely,

David Phillips
Executive Director

Mark J. Palmer
Associate Director