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Wildlife Heritage and Conservation
Since 1870

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January 23, 2026

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

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

Re: Comments on the 11th National OCS Oil and Gas Leasing Draft Proposed Program (2026-2031), Document ID BOEM-2025-0483-0001

Dear Ms. Hammerle:

On behalf of the California Fish and Game Commission (Commission), we write to express our strong opposition to the expansion of Pacific offshore oil and gas leasing activities, as proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program (11th OCS DPP), dated November 2025. The six proposed leases off California conflict with the mission of the Commission and the will of California's nearly 40 million residents, as well as decades of state-led efforts to protect our marine resources and coastline. The proposed California leases pose unacceptable risks to the long-term sustainability of our ecologically significant, culturally important, and economically valuable ocean and coastal ecosystems and put national security and shipping lanes at risk, while also adding unnecessary strain on the federal government.

For these reasons, we urge you to remove all California Program Areas from consideration for future oil and gas leasing activities and halt development of a new 2026-2031 National OCS Oil and Gas Leasing Program.

The Commission's Mission Emphasizes Abundant and Diverse Fish, Wildlife and Habitats

Established in 1870, the Commission is one of the nation's first wildlife conservation agencies, predating even the U.S. Commission of Fish and Fisheries. The Commission's vision is a healthy, biodiverse, and natural California in which native fish and wildlife thrive within dynamic ecosystems and inspire human interaction and enjoyment. The Commission is committed to supporting abundant and diverse fish and wildlife, with a management approach that fosters public confidence and participation.

We hold California's resources in the public trust and implement scientifically sound policies that protect, enhance, and restore California's native fish and wildlife species and ecosystems, securing a rich and sustainable outdoor heritage for all generations. To carry out this mission, we have a wide range of responsibilities, including regulating fishing and hunting; establishing marine protected areas (MPAs), wildlife areas, and ecological reserves; listing threatened and endangered species under the California Endangered Species Act; and leasing state water bottom lands for aquaculture and kelp harvest.

In our effort to effectively protect and sustain the State's resources in a way that fosters public confidence and participation, we must respectfully request that any National Outer Continental Shelf Oil and Gas Leasing Program better reflect the will of Californians.

Californians Oppose New Offshore Oil and Gas Leasing

There are 30 active leases in federal waters off southern California, many of which were granted in the 1960s and 1970s. However, a new offshore oil and gas lease hasn't been approved in federal waters off the California coastline since 1984; this is due to the overwhelming, ongoing, bipartisan and largely statewide opposition to new offshore oil and gas drilling by California congressional delegates, state and local elected officials and governments, Tribes, and members of the public.

California Has Invested in Durable Ocean Protections

California has invested more than 45 years in creating durable ocean protections. Over the last four decades, Californians have worked with federal partners to create five national marine sanctuaries in federal waters (designated from 1980 to 2024). The California State Legislature designated the California Coastal Sanctuary in unleased state waters in 1994. And, following 13 years of public process, in 2012 the Commission established the first science-based, statewide network of MPAs in the world.

Each of these spatial protections is designed to protect California's marine natural heritage, both in state and federal waters. And in all cases, they explicitly prevent commercial extraction of oil, gas, and minerals.

As proposed, the 11th OCS DPP would undermine 45 years of California-led efforts to protect our ocean from new oil and gas development.

Californians Support Strong Coastal Protections on Land

Following the 1969 Santa Barbara oil spill, the biggest U.S. oil spill in history at the time, Californians spoke with a unified voice to also protect our coastal resources on land. In 1972, voters passed Proposition 20 and declared that "the permanent protection of the remaining natural and scenic resources of the coastal zone is a paramount concern to present and future residents of the State and nation."[1] The California State Legislature subsequently passed the California Coastal Act in 1976 to carry forward this California vision.

The California Coastal Program, approved by the National Oceanic and Atmospheric Administration (NOAA) in 1978, has since been recognized as one of the most successful in

[1] Cal. Pub. Resources Code Section 27000 (1972)

the world. Hundreds of public beach accessways, coastal trails, wetlands, unique terrestrial habitats, and threatened and endangered species have been protected from encroaching development. Indeed, thousands of acres of coastal lands have been preserved.

After more than forty years of work, it would be irresponsible to expose these vulnerable areas to damage from new oil and gas development.

California has lived the consequences of oil spills along our shoreline. Just in the last 10 years, the Plains All American and Amplify Energy oil spills have impacted California wildlife and habitats, cultural values and communities, and our state's economy. Today we feel the impacts of climate change and environmental disruptions in new, concrete ways that we didn't 40 years ago. Catastrophic wildfires, drought, domoic acid events, sea star wasting disease, and substantial kelp loss are just some of the acute impacts California faces due to climate change.

The Pacific leases proposed in the 11th OCS DPP would put California's long-protected coastal resources at risk from oil spills and exacerbate the already-palpable impacts of our changing climate.

The Proposed Lease Sales in California Program Areas Pose Significant Risks to Our Marine Ecosystems and Wildlife

California's coastline is part of the California Current Large Marine Ecosystem (CCLME), which runs along the West Coast of the United States and is one of the most productive upwelling systems in the world. This dynamic system draws cold, nutrient-rich waters from the deep to the surface, fueling phytoplankton growth and sustaining a biodiversity hotspot of fish, seabirds, and marine mammals. Beyond its ecological importance, the CCLME helps regulate California's mild, temperate climate.

In recognition of this critical ecosystem and the impressive diversity it supports, nearly 17,000 square miles of ocean and seafloor habitats are protected in five national marine sanctuaries along California's coastline. To further support ecosystem-based management of this ecologically important area, the Commission established a network of 124 MPAs along our entire 1,100-mile coastline.[2] California's statewide MPA network was recently included on the International Union for the Conservation of Nature Green List of Protected and Conserved Areas[3] and recognized as the international gold standard for science-based marine conservation — the first nature network in the world to receive this status.

The proposed expansion of offshore oil and gas development in the 11th OCS DPP threatens to undermine these protections and the wildlife protected therein and must be duly considered by BOEM in proposing any new industrial uses off California. Construction and operation of platforms, pipelines, and onshore infrastructure —combined with increased vessel traffic and shipping lane congestion — pose significant risks to marine life, sensitive habitats, unique and protected species, and water quality. The increased likelihood and magnitude of oil spills,

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[2] https://wildlife.ca.gov/Conservation/Marine/MPAs

[3] https://iucn.org/press-release/202506/californias-marine-protected-area-network-joins-iucn-green-list-more-doubling

seafloor disturbance, discharge of drilling debris and fluids, and cumulative industrial impacts could irreparably harm ecosystems that have taken decades to safeguard.

The environmental value of California's ocean and coastal resources far outweigh any potential benefits from additional oil and gas development. The risks would jeopardize a functioning offshore ecological engine and compromise the unique and irreplaceable California coast.

New Offshore Oil and Gas Leasing Would Put Tribes and Cultural Resources at Risk

California is home to approximately 170 California Native American Tribes and Tribal communities, including 109 federally recognized Tribes. Many have deep ties to the ocean and coast that date back to time immemorial. California Native American Tribes have inhabited and stewarded California's coast and ocean for many thousands of years. Historical wrongs, including war, violence, attempted genocide, and the forced removal of Native peoples from their homelands, continue to impact Tribal communities to this day. Historically, Tribes in California have had limited ability to purchase and access land, minimal opportunity for economic development, and an increased risk of exposure to air and water pollution resulting from resource extraction.

California Native American Tribes did not cede their inherent rights and responsibilities to steward the lands, waters, or ocean territory of what is now known as California. Many continue to rely on marine ecosystems for food, medicine, and cultural use, and are actively engaged in research, monitoring, and stewardship work to protect these ecosystems. Some California Tribal citizens participate in ocean-based industries such as aquaculture or commercial fishing. And inland Tribes often have direct ties to the coast through trade, seasonal ceremonies, or kinship with coastal Tribes.

In consultations with State government, California Native American Tribes have consistently expressed that food security, economic prosperity, and cultural lifeways depend on a healthy coast and ocean. The environmental risks associated with additional offshore oil and gas development have the potential to undermine this relationship and negatively impact California Native American Tribes in unacceptable ways. Additionally, development has the potential to negatively impact Tribal cultural resources, including archaeological and historical resources such as villages, places of ceremony, burial sites, and shell mounds, as well as viewsheds, landscapes, and species of cultural importance.

The 11th OCS DPP acknowledges in Section 13.5 that "[p]lanning areas under consideration for inclusion in the 11th Program include the traditional lands and waters of American Indian and Alaska Native communities."4 However it goes on to say that Tribes were only notified via letter and given just 45 days to respond and inform the first draft of the proposal. Although it appears that 12 Tribes and Tribal entities provided feedback to BOEM within this abbreviated timeline, only two California Native American Tribes — the Yurok Tribe and the Santa Ynez Band of Chumash Indians — submitted comments. Notably, all 12 Tribal commenters

[4] Bureau of Ocean Energy Management. 2025. 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program: 1st Analysis and Proposal. BOEM 2025-046. Available online at https://www.boem.gov/11th-National-Program-1st-Analysis. November 2025.

expressed opposition and/or asked for specific geographic exclusions. Many asked for improved Tribal consultation.

In developing any proposal for offshore oil and gas leasing, BOEM must prioritize early, often, intentional, and meaningful consultation with Native American Tribes. Indeed, page 4 of BOEM's own Tribal Consultation Guidance says "[i]It is the policy of the Department to recognize and fulfill its legal obligations to identify, protect, and conserve Tribal trust resources; carry out its trust relationship with Federally recognized Tribes and Tribal members; and invite Tribes to consult on a government-to-government basis whenever there is a Departmental Action with Tribal Implications."[5]

BOEM's reliance on a single letter and a 45-day response window falls short of the early, often, intentional, and meaningful consultation that its own guidance calls for. To meet its legal obligations and stated commitments, BOEM must strengthen its approach by implementing a proactive, ongoing process that provides adequate time and resources for Tribal engagement before advancing any offshore oil and gas leasing proposals. This is essential to protect Tribal rights, cultural resources, and the integrity of BOEM's decision-making.

Proposed Leasing Would Threaten Coastal Communities

Nearly 70% of all Californians live in coastal counties, and millions visit the coast each year. Expanded offshore oil and gas threatens these communities by degrading air and water quality, increasing the risk of oil spills, and compromising public health, safety, and access to California's iconic coastal zone.

The Commission's adopted policies emphasize decisions that ensure safe access to California's natural resources, foster public confidence, and are made in a fair, equitable, and inclusive manner, while ensuring California's fish and wildlife are managed with robust public participation. BOEM's proposal runs counter to these principles by introducing risks that disproportionately impact vulnerable populations and undermine equitable access to healthy coastal environments.

Coastal offshore oil exploration, development, and transportation pose serious health and safety risks to coastal communities through increased emissions, environmental contamination, and heightened spill potential. Pollutants from drilling operations and vessel traffic can reach nearby coastal communities exposing residents to toxins and carcinogens linked to acute symptoms and chronic conditions such as cancer, liver damage, immune dysfunction, and neurological harm.

New or expanded oil and gas activity off the California coast would also increase reliance on pipelines, inland refineries, and other infrastructure, compounding environmental burdens for adjacent communities. Historically underserved and marginalized populations — including Tribal communities, communities of color, and low-income neighborhoods — face disproportionate exposure due to proximity to industrial sites associated with oil and gas development, including the San Francisco Bay Area, Los Angeles, and the Central Valley. Vulnerable groups such as children and the elderly bear heightened health risks and greater barriers to recovery. California already contends with thousands of toxic sites along its

[5] Bureau of Ocean Energy Management Tribal Consultation Guidance, Dec 9, 2024 at pages 4-5.

shoreline, many in disadvantaged areas; expanded oil development would exacerbate these inequities.

Access to the coast is a constitutional right in California and a cornerstone of the California Coastal Act. Clean beaches and ocean waters provide recreation, community and cultural connection, and mental and physical well-being for California residents and visitors. Increased oil activity and spill risk threatens this access, disconnecting people from nature and diminishing community health.

Oil spills also jeopardize food security for tens of thousands of fishermen — many from Tribal and low-income communities — who rely on shore-based fishing for subsistence. Contaminated seafood and fishery closures due to oil-related toxins or spills eliminate an essential food source and increase exposure to harmful toxins for people who rely on these fish to feed themselves and their families.

For all these reasons, the proposed Pacific oil and gas leases are in direct conflict with the Commission's policies and the deeply held values of California.

New Offshore Drilling Threatens California Economies

California has some of the healthiest fisheries in the world, thanks to the implementation of forward-thinking ocean and coastal protections over the last four decades and smart fisheries management. We are home to dozens of well managed commercial fisheries that, in 2024, landed 178 million pounds of catch worth nearly $200 million, a significant contribution to national seafood production. But oil spills and development threaten this American economic engine.

Following the Plains All American oil spill offshore of Santa Barbara County in 2015, catch volume and value in the area declined dramatically relative to prior years and was slow to recover. OCS oil and gas production infrastructure (platforms, pipelines, and cables) and exploration (including high-energy seismic surveys) can also result in loss of productive fishing grounds and reduced catch rates.

The Commission's Coastal Fishing Communities Policy says, "[i]t is the policy and practice of the California Fish and Game Commission to support, in its decision-making and actions, the long-term needs, social well-being, and economic health of coastal fishing communities in a manner that aligns with the primary conservation and management goals of the Commission's and Department's missions and mandates, and other applicable laws."[6]

California's fishing industry should not be put at risk by new oil and gas leasing activities.

Tourism and recreation within California's coastal and offshore environments are also essential to state and national economic interests. In 2021, California's marine economy supported $26.7 billion in wages and $51.3 billion in gross domestic product (GDP).[7] From 2010 to 2016, California's coastal economy GDP outpaced the national average by nearly 2:1. Tourism and

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[6] https://fgc.ca.gov/About/Policies/Fisheries

[7] National Oceanic and Atmospheric Administration (NOAA). 2023. 2020 Marine Economy Report: California. Office for Coastal Management: https://coast.noaa.gov/data/digitalcoast/pdf/marine-economy-california.pdf

recreation is the largest sector in California's marine economy, contributing 47% of the total GDP. These sectors rely heavily on clean, accessible beaches and coastal waters, as well as diverse and abundant populations of marine wildlife for whale watching, diving, and fishing. Increased oil and gas development in California's OCS will eliminate or reduce access to coastal waters for these activities and will increase risk of an oil spill from production and pipeline transport, threatening the significant economic benefits that result from a healthy ocean.

Putting these valuable tourism and recreation resources at risk with additional offshore oil and gas development is not in the interest of Californians or visitors to California's coast.

Proposed Leasing Puts National Security and Shipping Lane Integrity at Risk

The Commission has long recognized that California's ocean is a shared space with multiple, sometimes competing priorities. In fulfilling our mandates for fishery access and conservation planning, we have consistently constrained our own actions to respect the nation's high priorities of preserving military-designated security zones and maintaining the integrity of shipping lanes and maritime commerce. Even when doing so would advance conservation goals, we have avoided encroachment because we understand the critical importance of these national interests.

We now ask BOEM to apply the same principle. Offshore oil and gas leasing in the California Program Areas would introduce industrial infrastructure into mission-critical spaces for U.S. defense readiness and global trade. California ports handle over 40 percent of the nation's containerized imports, and the Pacific fleet depends on open, unobstructed sea lanes. for rapid deployment. These priorities are embedded in California's policies and align with federal objectives under this U.S. Administration.

To safeguard national security and shipping lane integrity we urge BOEM to exclude the California Program Areas from consideration.

Launching a New National OCS Oil and Gas Leasing Program for 2026-2031 is Inefficient and Unnecessary

Currently, BOEM is only 18 months into implementing the 10th National Outer Continental Shelf Oil and Gas Leasing Program, which remains in effect through June 2029. Developing and vetting the existing program required 17 months of work, extensive public engagement, and significant government resources to comply with the Outer Continental Shelf Lands Act, the Administrative Procedure Act, and the National Environmental Policy Act. The current program reflects input from 762,000 comments nationwide from governments, Tribes, agencies, stakeholders, and the public, and was upheld by the D.C. Circuit Court last year.

Restarting this process now would duplicate work already completed and divert limited agency capacity and taxpayer dollars. BOEM manages 3.2 billion acres of the OCS with fewer than 600 employees,[8] and Congress has already mandated 36 additional leases by BOEM through 2040, outside the current 2024-2029 Program.[9] Adding 1.3 billion additional acres under the

[8] https://www.boem.gov/factsheet/about-boem

[9] Section 50102 of the One Big Beautiful Bill Act (OBBBA, Pub. L. No. 119-21)

11th OCS Draft Proposed Program would strain resources and undermine efficient governance.

Rather than initiating a costly, unnecessary, and wasteful new planning process with nearly 3.5 years left under the existing program, BOEM should focus on fulfilling current commitments. Doing so will ensure government efficiency, avoid waste, and uphold BOEM's responsibilities under existing law and policy.

Conclusion

For all the reasons above, the California Fish and Game Commission urges you to remove all California Program Areas from consideration for any future oil and gas leasing activities.

Additionally, with the 10th National OCS Oil and Gas Leasing Program (2024-2029) underway, and in an effort to conserve government resources and taxpayer dollars, we encourage you to halt development of a new, unnecessary 2026-2031 National OCS Oil and Gas Leasing Program.

If you have any questions or need additional information, please do not hesitate to contact Commission Executive Director Melissa Miller-Henson at FGC@fgc.ca.gov or (916) 653-4899.

Sincerely,

Samantha Murray
Vice President and
Marine Resources Committee Co-Chair

Eric Sklar
Commissioner and
Marine Resources Committee Co-Chair

Cc: Wade Crowfoot, Secretary for Natural Resources, State of California
Valerie Termini, Acting Director, California Department of Fish and Wildlife