January 21, 2026

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

Re: Docket No. 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 Pacific Coast Federation of Fishermen's Associations (PCFFA) and the Institute for Fisheries Resources (IFR) submit these comments. The Pacific Coast Federation of Fishermen's Associations (PCFFA) is a statewide coalition of commercial fishing organizations led by working fishermen from ports along the California coast. We are the voice of California's working commercial fishermen, standing up to protect their ability to make a living from the ocean. Our members are independent, small-scale commercial fishing businesses. We bring real-world experience, knowledge, and practical solutions to ocean management decisions because this is our work and we know what is at stake. The Institute for Fisheries Resources (IFR) is PCFFA's sister organization, focusing primarily on fisheries habitats, environmental conditions, and the protection of sustainable commercial fisheries.

PCFFA and IFR submit these comments in response to the Bureau of Ocean Energy Management's Notice of Availability of the Draft Proposed Program for the 11th National Outer Continental Shelf Oil and Gas Leasing Program, including BOEM's solicitation of nominations for environmentally sensitive areas that may be considered for exclusion from leasing at this stage of the program development process.

We are responding to BOEM's Draft Proposed Program because our sector has much to lose if offshore oil and gas leasing is allowed to return to the Pacific. Commercial fishing is not a theoretical use of the ocean. It is active, essential, and ongoing. California's commercial fishing fleet contributes to food production, economic stability, and the cultural fabric of the coast. These are small businesses that rely on healthy, accessible fishing grounds to stay in operation and support the next generation of fishermen. Our fisheries are not speculative. They are a proven, renewable public benefit that feeds families and supports coastal economies.

PCFFA and IFR strongly oppose any inclusion of the Pacific Coast in future offshore oil and gas leasing. Consistent with BOEM's request for nominations of areas to exclude from leasing, PCFFA and IFR formally nominate the entire California Outer Continental Shelf for exclusion from leasing under the 11th National OCS Oil and Gas Leasing Program, including the Southern California, Central California, and Northern California Planning Areas. The risks to commercial fishing, seafood production, and healthy ocean ecosystems are real and well documented. There is no demonstrated need, no public mandate, and no scientific justification that outweighs the risks to ocean health, fishing access, or long-term economic security for working communities.

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The areas BOEM is considering off California include highly productive marine waters, evidenced by the strength of our upwelling systems, clean cold water, and diverse habitats that support healthy fisheries. Sustainable commercial fisheries are compatible with this environment and have coexisted with conservation-based management for decades. Offshore oil and gas development is not. Including California waters in the Draft Proposed Program undermines existing federal investments in ecosystem-based fishery management and marine conservation efforts carried out through NOAA and NMFS and incorporated into BOEM's own planning and environmental review processes.

Federal waters off the Pacific Coast support California's most valuable commercial fisheries, managed through strict seasonal closures, area restrictions, gear mandates, and catch limits designed to protect the long-term health of marine resources. This system works. Our fisheries are well managed, productive, and provide a reliable source of food and income.

In 2023, commercial landings in California totaled more than 130 million pounds of seafood, with an ex-vessel value exceeding 260 million dollars. That figure does not include the added value generated through seafood processors, distributors, and the many small businesses that rely on a steady supply of wild-caught seafood. The commercial fishing sector supports thousands of direct and indirect jobs and remains a critical economic driver for many coastal towns.

Oil and gas development is incompatible with this system. It introduces permanent structures, noise, vessel traffic, and pollution risks that no fishing regulation can prevent or absorb. Offshore oil and gas infrastructure also creates safety and operational exclusion zones that restrict vessel operations and eliminate access to productive fishing grounds even in the absence of spills. Once fishing grounds are lost or contaminated, the damage lasts for years. The Refugio spill in 2015 shut down key fisheries and affected more than 150 square miles of water. The 2021 Huntington Beach pipeline rupture released an estimated 25,000 gallons of oil, disrupting nearshore ecosystems and seafood markets and triggering lengthy fishery closures.

These are not theoretical risks. Commercial fishing has been a core part of California's coastal economy for generations. When access to these waters is lost, we lose more than food. We lose jobs, income, and the working ports and communities that depend on them.

PCFFA and IFR also urge BOEM to recognize that allowing new oil and gas leasing off California will exacerbate conflict between state and federal ocean policy. The State of California has made its position clear for decades: no new offshore oil and gas development. This position is backed by bipartisan leadership and reflected in state law. Pursuing leases off the California coast would ignore local knowledge, override consistent public opposition, and deepen regulatory uncertainty. These waters are not a blank slate. They are actively managed under federal and state fishery laws and coastal policies created to prioritize public use, environmental protection, and food production.

The commercial fishing industry is not against change or progress. We operate under some of the strictest environmental protections in the world and continue to adjust to changing ocean conditions and complex regulations. But we cannot coexist with extractive industries that eliminate access to the waters we rely on. Once productive fishing areas are permanently closed off to commercial use, there is no backup plan for the working waterfronts, seafood systems, and coastal economies that depend on them.

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Commercial fishing has always been part of this region's identity, economy, and food system. When fishermen are pushed out, we do not just lose food production. We lose the jobs, identity, and way of life that have defined California's working coast for generations.

For these reasons, PCFFA and IFR urge BOEM to exclude all California OCS planning areas from further leasing consideration and to carry this exclusion forward into the Proposed Program for the 11th National OCS Oil and Gas Leasing Program. Protecting the West Coast from offshore drilling is the only path consistent with sound science, community well-being, and long-term public benefit.

Sincerely,

Lisa Damrosch
Executive Director
Pacific Coast Federation of Fishermen's Associations (PCFFA)
& Institute for Fisheries Resources (IFR)