SEA TURTLE CONSERVANCY
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January 23, 2026

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

Dear Ms. Hammerle,

I am writing on behalf of the Florida-based Sea Turtle Conservancy (STC), the oldest sea turtle conservation group in the world, to **urge the Bureau of Ocean Energy Management (BOEM) to issue no new lease sales – particularly within "Gulf of America Planning Area B" – in developing the 11th National Outer Continental Shelf Oil and Gas Leasing Program.**

In a letter sent on December 4, the entire Florida Congressional Delegation urged the President to reject any attempt to expand offshore drilling near Florida's coasts.[1] Florida's senators and representatives cited the bipartisan support the President received by extending the moratorium on oil and gas leases off of Florida's coasts through 2032 and urged him to continue to protect the natural resources, coastal economy, and sustainable fisheries of the Gulf.

Five species of federally-listed threatened or endangered sea turtles utilize the Gulf for reproduction, feeding, migration and refuge. STC has discovered that the Gulf is particularly important for the survival of the Northwest Atlantic leatherback sea turtle population. In a recently-published study that spanned 14 years and tracked 40 adult leatherback sea turtles, STC found that one of the largest-remaining populations of leatherbacks in the world, which nests along the Caribbean coast of Central America, uses the Gulf as a year-round foraging site between inter-annual migrations back to their nesting beaches. Within the Gulf, turtles are utilizing three primary areas: the northeastern Gulf along the Panhandle of Florida, south of Louisiana, and the Southern gulf in the Bay of Campeche, Mexico. Each of these areas is connected by a shared corridor. [2] These high-use habitats overlap with some of the highest density areas for oil and natural gas platforms off the coasts of Alabama, Mississippi, and Louisiana – the areas that also encompass the Eastern Gulf and Central Gulf areas on the Outer Continental Shelf Planning Areas map. [3] In 2025 alone, STC tracked eight sea turtles that were satellite-tagged in Florida and the Caribbean who spent significant time foraging in the Gulf. [4]Adding further oil and gas platforms and conducting seismic blasting in these sensitive areas would threaten endangered and threatened populations of sea turtles whose populations have just begun to show signs of recovery after decades of tireless conservation work.

The Gulf also hosts extensive Sargassum habitat that small, oceanic juvenile turtles depend on for survival.[5] Since 2018, STC has carried out an in-water research project to study the sea turtles in the Eastern Gulf in order to determine the spatial and temporal distribution of sea turtles in the area, collect important biometric information to conduct health assessments, determine sea turtle behavior and movements, and uncover threats to their survival such as harmful algal blooms, fisheries interactions, marine debris, vessel strikes, and more. [6] The

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[1] Letter to the president from Florida's congressional delegation. https://bilirakis.house.gov/sites/evo-subsites/bilirakis.house.gov/files/evo-media-document/florida-delegation-letter-opposing-offshore-drilling-2025.pdf. December 4, 2025

[2] Evans, D. et. al. 2021. Identification of the Gulf of Mexico as an important high-use habitat for leatherback turtles from Central America. Ecosphere 12(8):e03722. 10.1002/ecs2.3722

[3] National Oceanic and Atmospheric Administration. *Gulf of Mexico Data Atlas – Oil and Gas Structures*. https://www.ncei.noaa.gov/maps/gulf-data-atlas/atlas.htm?plate=Offshore%20Structures

[4] Figure 1, Appendix.

[5] National Oceanic and Atmospheric Administration. *Deepwater Horizon Oil Spill Final Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement. Section 4 – Injury to Natural Resources.* 4-516.

[6] Sea Turtle Conservancy. Florida In-Water Research – Big Bend Sea Turtles. https://conserveturtles.org/project/stc-programs-research-florida-in-water/

seagrass habitat in the Eastern Gulf is one of the largest remaining and most pristine in the world; allowing for oil and gas exploration in this area would cause irreparable harm to this important developmental area that is utilized by sea turtles across the Caribbean.

Oil spills have the potential to impact sea turtles at all life stages of development. Oil that has washed up on beaches can contaminate sea turtle nests and impact nesting females and hatchlings. Because sea turtles are air breathing reptiles, they can inhale oil vapors and become coated in oil at the water's surface. Sea turtle prey can also be killed or contaminated by oil or dissolved oil components. [7] After the Deepwater Horizon Oil Spill in 2010, officials found evidence that each of these harms were inflicted upon sea turtles, which led to the deaths of an estimated 4,900 and up to 7,600 large juvenile and adult sea turtles and between 55,000 and 160,000 small juvenile sea turtles.[8] While oil was actively spilling into the Gulf, STC watched as "Dawn," an adult leatherback sea turtle that STC satellite-tagged after nesting in Panama, swam directly into the BP Oil Spill. Dawn's movements did not seem to change once she entered areas with visible oil slicks. Between July 23 and September 27, 2010, Dawn entered into the oil spill area on two separate occasions.[9] While her ultimate fate is unknown, Dawn's movements highlight the frequency of sea turtle interactions with oil and gas platforms in the Gulf and the potential harm that awaits them whenever inevitable spills occur.

In addition to providing valuable ecosystem services, sea turtles are incredibly valuable to Florida's economy. Thousands of residents and visitors participate in supervised "turtle walks" during sea turtle nesting season, eco-boat trips, and snorkeling excursions just to witness Florida's iconic sea turtles in the wild. The expansion of offshore drilling in the Gulf, and the associated risk of oil spills, threatens Florida's fragile environment that is directly linked to the success of its nature-based tourism economy.

Although the Deepwater Horizon Oil Spill took place 15 years ago, the harm done to these species threatened decades of sea turtle recovery efforts. The loggerhead, green, leatherback, Kemp's ridley and hawksbill sea turtles that utilize the Gulf already face numerous additional anthropogenic threats to their survival. In fact, in 2020, the U.S. Fish and Wildlife Service and the National Marine Fisheries Service reported a decline in the overall nesting trend of the Northwest Atlantic leatherback sea turtle population.[10] By not approving additional oil and gas leases in developing the 11th National Outer Continental Shelf Oil and Gas Leasing Program, the U.S. has the ability to prevent another potential disaster that could push this population even closer to extinction.

In summary, we ask you to protect all U.S. waters – especially those under an oil and gas moratorium until 2032 – from any new leasing in developing the 11th National Outer Continental Shelf Oil and Gas Leasing Program. Florida's unique natural resources and tourism economy cannot handle another catastrophic oil spill in the future.

Sincerely,

Stacey Gallagher
Policy Coordinator

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[7] National Oceanic and Atmospheric Administration Office of Response and Restoration. (2016, June 16). *How do Oil Spills Affect Sea Turtles?* https://response.restoration.noaa.gov/about/media/how-do-oil-spills-affect-sea-turtles.html#:~:text=The%20potential%20impacts%20of%20an,killed%20or%20contaminated%20by%20oil.

[8] National Oceanic and Atmospheric Administration. *Deepwater Horizon Oil Spill Final Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement. Section 4 – Injury to Natural Resources.* 4-517.

[9] Evans, D. et al. (2011). *Tracking "Dawn" Into the Horizon Oil Spill*. Poster presented at the International Sea Turtle Symposium.

[10] National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). (2020). *Endangered Species Act status review of the leatherback turtle (Dermochelys coriacea).* Report to the National Marine Fisheries Service Office of Protected Resources and U.S. Fish and Wildlife Service.

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Appendix

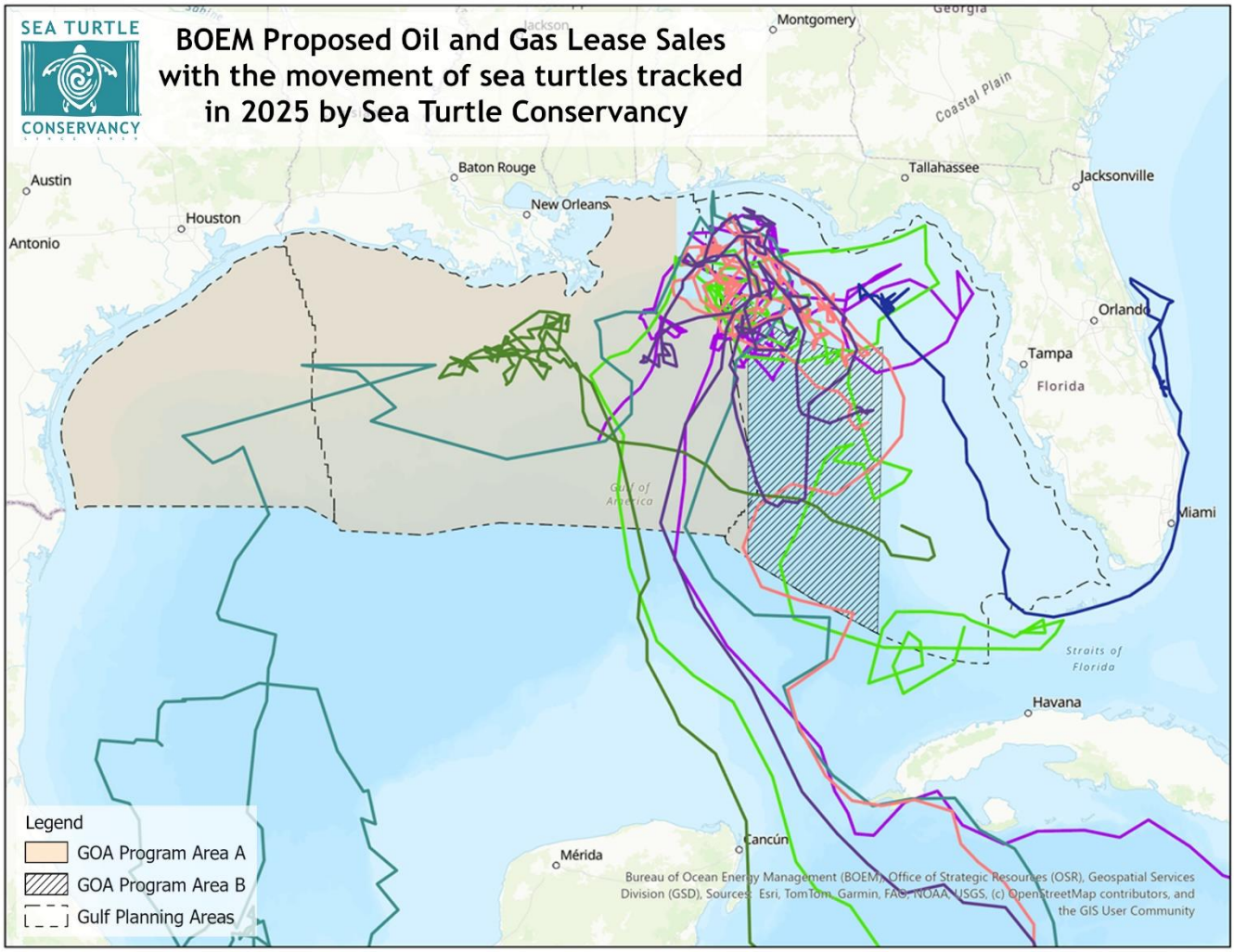

Figure 1: BOEM's Proposed Oil and Gas Lease Sales overlaid with the movement of a subset of sea turtles tracked by Sea Turtle Conservancy (STC) in 2025. STC has satellite-tagged sea turtles for more than a decade and has found that the Gulf is an important high-use habitat for a variety of sea turtle species.

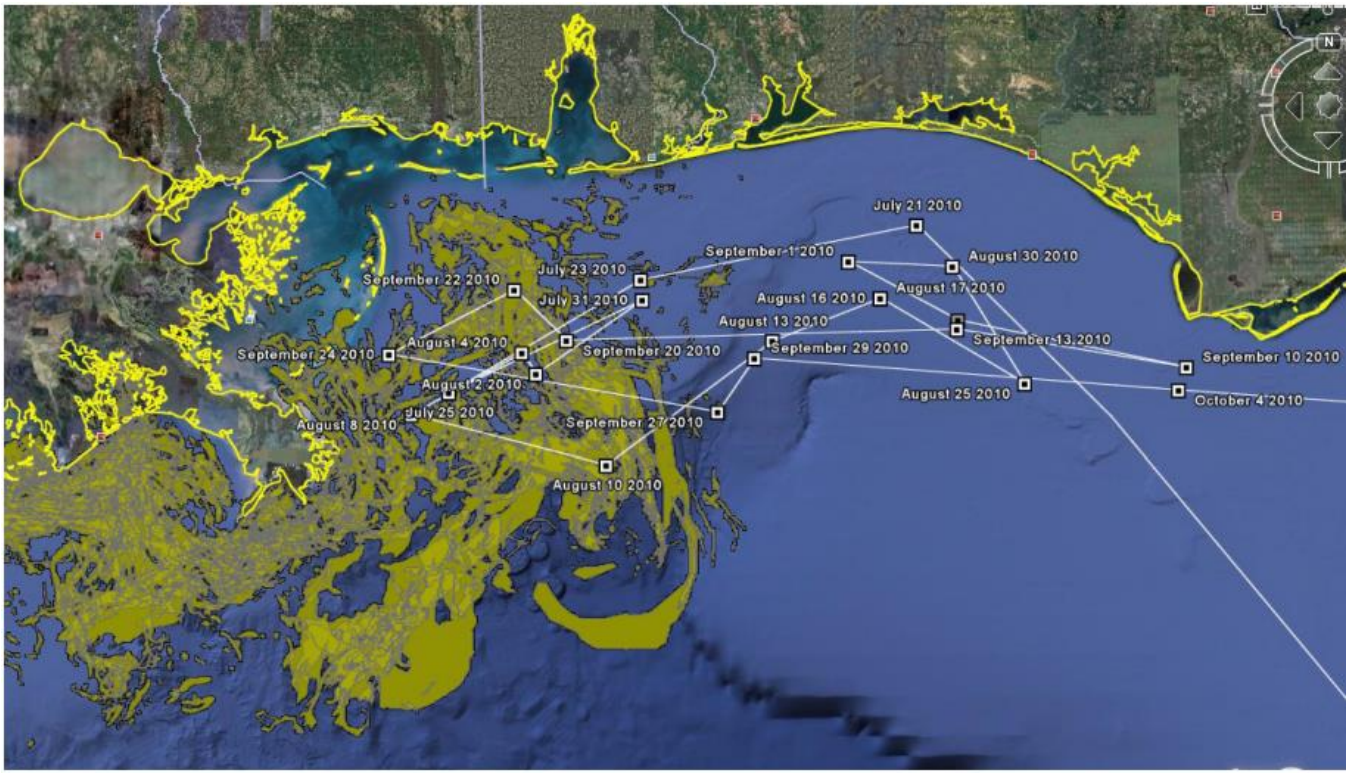

Figure 2: In 2010, STC watched as "Dawn," an adult leatherback sea turtle that STC satellite-tagged after nesting in Panama, swam directly into the BP Oil Spill. Dawn's movements did not seem to change once she entered areas with visible oil slicks. Between July 23 and September 27, 2010, Dawn entered into the oil spill area on two separate occasions. While her ultimate fate is unknown, Dawn's movements highlight the frequency of sea turtle interactions with oil and gas platforms in the Gulf and the potential harm that awaits them whenever inevitable spills occur