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Camarillo, California 93010

Re: Call for Information and Nominations for Central California Outer Continental Shelf Oil and Gas Lease Sales Proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program; and Call for Information and Nominations for Southern California Outer Continental Shelf Oil and Gas Lease Sales Proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program

Dear Ms. Sumait:

Oceana is disappointed that the Bureau of Ocean Energy Management (BOEM) is still considering expanding the footprint of oil and gas leasing on the Outer Continental Shelf (OCS) by publishing calls for information and nominations (Calls) for Southern and Central California. As an initial matter, BOEM cannot begin the lease sale process for an area not included in the active Five-Year Program, and it would be inappropriate to do so before BOEM has started to consider the environmental impacts in the Five-Year Program process. Further, these areas are unavailable for leasing because they have been previously withdrawn under Section 12(a) of the Outer Continental Shelf Lands Act (OCSLA). Additionally, any areas in and around National Marine Sanctuaries must be excluded from consideration.

After considering the vast opposition to offshore drilling in California expressed during the comment period for the Draft Proposed 11th Outer Continental Shelf Oil and Gas Leasing Program, BOEM should abandon this misguided effort to lease off the coast of California. Oil and gas production offshore California is incompatible with the state's vibrant ocean ecosystems, culture, and economy.

In addition to this letter, Oceana is resubmitting comments on behalf of our 1,920 California members who voiced opposition to offshore drilling expansion during the Draft Proposed Program comment period.

THE TIMING OF THE CALLS IS ILLEGAL AND INAPPROPRIATE

BOEM does not have the authority to begin the pre-lease sale process before areas are included in a final Five-Year Program, and the agency's reliance on a prior Solicitor's Opinion is inadequate. Even if BOEM could move forward at this time with the Calls, it is inappropriate to do so before the environmental analysis for the Five-Year Program has been published.

Under OCSLA, "no lease shall be issued unless it is for an area included in the approved leasing program."[1] The statute does not clarify the timing for starting the lease sale process, but BOEM's regulations state that "BOEM issues a Call for Information and Nominations . . . on *an area proposed for leasing* in the Five Year program through publication in the Federal Register and other publications."[2] The final product of the Five-Year Program process is a "schedule of proposed lease sales,"[3] so an area is only proposed for leasing once the Secretary of the Interior signs the Record of Decision.[4] BOEM's regulatory provision makes clear that BOEM must wait for a Five-Year Program to be finalized to begin the leasing process, but BOEM has not yet made California "an area proposed for leasing" in a final program. BOEM must follow its own regulations and wait until there is an area proposed for leasing before publishing these Calls.

In the Draft Proposed Program, BOEM states that "in some cases, lease sales occurring early in a National OCS Program schedule require that steps are taken in the pre-lease sale process prior to final National OCS Program approval."[5] As authority to begin the pre-lease sale process early, BOEM cites to a 1986 Solicitor's Opinion, but that opinion is inapposite. The Solicitor's Opinion related specifically to Lease Sale 91.[6] The area considered for Lease Sale 91 was in the Five-Year Program that was current at the time of the opinion, but the program was in the process of being updated with Lease Sale 91 being rescheduled for the next program.[7] The Solicitor noted that "[b]ecause the sale itself could be held, it is unquestionable that the Department may carry out presale steps, such as issuing the call."[8] Unlike Lease Sale 91, no California planning area is in the current Five-Year Program (the 2024-2029 Program). So, the Solicitor's Opinion does not answer the question presented in this situation, and the regulatory language makes clear that BOEM cannot move forward with the Calls at this time.

In addition to being contrary to BOEM's regulations, publishing the Calls at this stage is inappropriate because BOEM has not even published its environmental analysis for the Five-Year Program. In the recent Draft Proposed Program, BOEM stated that "[d]etailed information on the environmental impacts of each program area carried forward in the 1st Proposal will be provided in the environmental analysis prepared in the 2nd Analysis."[9] The lack of environmental information provided by BOEM makes commenting on these Calls more difficult.

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[1] 43 U.S.C. § 1344(d)(3).
[2] 30 C.F.R. § 556.301 (emphasis added).
[3] 43 U.S.C. § 1344(a).
[4] *See*, *e.g.*, Record of Decision and Approval of the 2024-2029 National Outer Continental Shelf Oil and Gas Leasing Program (Dec. 14, 2023), https://www.boem.gov/oil-gas-energy/decision-memo-national-program-signed.
[5] Bureau of Ocean Energy Management, *11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program: 1st Analysis and Proposal* 1-11 (Nov. 2025), https://www.boem.gov/oil-gas-energy/national-program/11thnationalocsprogram1stanalysisandproposal.
[6] Solicitor's M Opinion 36954, Whether the Department May Issue a Call for Information & Nominations for Outer Continental Shelf Lease Sale 91, 93 I.D. 125 (1986).
[7] *Id.*
[8] *Id.*
[9] Draft Proposed Program at 12-10.

THE AREAS INCLUDED IN THE CALLS ARE NOT AVAILABLE FOR LEASING

1. Presidential Withdrawals Are Not Reversible

The entire EEZ off the coast of California was withdrawn pursuant to Section 12(a) of OCSLA, so BOEM cannot lease in these areas. Section 12(a) of OCSLA authorizes the president to withdraw any unleased areas from leasing disposition.[10] Presidents of both parties, dating back to President Eisenhower, have used this authority to prohibit oil and gas leasing in various areas of the ocean.[11]

Withdrawals under Section 12(a) are not reversible. When President Trump attempted to reverse President Obama's withdrawals offshore Alaska, the District Court of Alaska held that President Trump's actions exceeded his authority under Section 12(a) and found that only Congress could revoke prior withdrawals.[12]

Making these areas available for leasing would violate Section 12(a) of OCSLA and BOEM must remove them from consideration.

2. Oil and Gas Activities Cannot Occur in National Marine Sanctuaries

Our nation's resource protection laws have left no place for offshore oil and gas activities in National Marine Sanctuaries. The National Marine Sanctuaries Act exists to protect special places in the ocean from the effects of harmful human activity. Congress established the Act in recognition that "certain areas of the marine environment possess conservation, recreational, ecological, historical, scientific, educational, cultural, archeological, or esthetic qualities which give them special national, and in some cases international, significance."[13]

Protection of these special areas and their resources is the explicitly stated "primary objective" of the Act.[14] Consistent with that protective focus, the Act limits how marine sanctuaries can be used. Sanctuary designations must set forth specific activities that "will be subject to regulation by the Secretary to protect" sanctuary resources.[15] And while the Act allows issuance of "special use permits" for "conduct of specific activities" in sanctuaries, such permits can be issued "only

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[10] 43 U.S.C. § 1341(a).
[11] *See*, *e.g.*, Proclamation 3339, 25 Fed. Reg. 2352 (March 19, 1960) (withdrawing the Key Largo Coral Reef Preserve from leasing consideration); Memorandum on Withdrawal of Certain Areas of the United States Outer Continental Shelf from Leasing Disposition, 2020 WEEKLY COMP. PRESS DOCS. 659 (Sept. 8, 2020), accessed at https://www.govinfo.gov/content/pkg/DCPD-202000659/pdf/DCPD-202000659.pdf (withdrawing until June 30, 2032 areas offshore the Atlantic coasts of Florida, Georgia, and South Carolina).
[12] *League of Conservation Voters v. Trump*, 363 F. Supp. 3d 1013, 1029-30 (D. Alaska 2019), *vacated and remanded sub nom. League of Conservation Voters v. Biden*, 843 F. App'x 937 (9th Cir. 2021). The judgment was vacated by the Ninth Circuit as moot after President Biden reversed President Trump's order.
[13] 16 U.S.C. § 1431(a)(2).
[14] 16 U.S.C. § 1431(b)(6).
[15] 16 U.S.C. § 1434(a)(4).

if that activity is compatible with the purposes for which the sanctuary is designated and with protection of sanctuary resources."[16]

Drilling in marine sanctuaries does not comply with the protective purpose of the National Marine Sanctuary Act, or its restrictions on potentially harmful activities, because of the significant risk oil and gas extraction poses to sanctuary resources. NOAA has long recognized the risk oil and gas activities pose to sanctuary resources, which is why NOAA historically has excluded National Marine Sanctuaries from consideration for offshore leasing.[17] In 1998 and again in 2008, Presidents Clinton and George W. Bush, respectively, withdrew *all* extant marine sanctuaries on the OCS from oil and gas leasing.[18] Further, regulations establishing the individual marine sanctuaries prohibit oil and gas activities.[19]

Allowing oil and gas activities in National Marine Sanctuaries is not only illegal but also incompatible with the value that sanctuaries provide. The National Marine Sanctuary System generates approximately $8 billion annually through commercial fishing, research and education, and recreation and tourism-related activities.[20] Hundreds of thousands of people visit sanctuaries every year to take part in activities such as wildlife viewing, paddle sports, scuba diving, boating, and fishing.[21]

On the west coast, annual spending on recreational fishing in the California sanctuaries totals $155.6 million, supporting 1,400 jobs. California's sanctuaries uphold a thriving tourism economy and support important commercial and recreational fisheries. Off Cordell Bank National Marine Sanctuary, the remote waters allow for commercial fishers to catch hundreds of thousands of dollars in harvest revenue within the sanctuary, catching species such as Dungeness crab, chinook salmon, sablefish, Dover sole, and petrale sole. Monterey Bay supports thriving tourism through whale watching, diving, kayaking, boating, surfing, and other activities. Chumash Heritage is the newest National Marine Sanctuary and encompasses an area off the coast of central California that is highly important for commercial and recreational fishing, and supports highly valuable species such as Dungeness crab, market squid, sablefish, and shortspine thornyhead. Chumash Heritage NMS is also an area of cultural importance for the Chumash

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[16] 16 U.S.C. § 1441(a), (c)(1).
[17] *See* NOAA National Marine Sanctuaries, *Cordell Bank and Gulf of the Farallones National Marine Sanctuaries Expansion: Final Environmental Impact Statement* 5-30–5-31 (2014) ("Oil and gas development in the marine environment has historically posed significant risks to marine resources, as evidenced by the magnitude of impacts of some offshore oil spills. Therefore, NOAA has usually excluded traditional energy exploration and production in our nation's national marine sanctuaries.")
[18] Memorandum on Withdrawal of Certain Areas of the United States Outer Continental Shelf from Leasing Disposition, 34 Weekly Comp. Pres. Doc. 1111 (June 12, 1998); Memorandum on Modification of the Withdrawal of Areas of the United States Outer Continental Shelf From Leasing Disposition, 44 Weekly Comp. Pres. Doc. 986 (July 14, 2008); *see* BOEM, *Areas Under Restriction*, *II: National Marine Sanctuaries*, https://www.boem.gov/oil-gas-energy/leasing/areas-under-restriction (last visited June 4, 2025).
[19] *See*, *e.g.*, 15 C.F.R. § 922.72(a)(1) (prohibiting "exploring for, developing, or producing hydrocarbons within the [Channel Islands National Marine] Sanctuary").
[20] NOAA, *Sanctuaries* (May 21, 2025), https://www.noaa.gov/sanctuaries.
[21] *Id.*

Peoples, who have occupied the central coast area for over 20,000 years, and for whom the heritage area is "a place of deep spiritual significance and cultural identity."[22] In the Gulf, Flower Garden Banks National Marine Sanctuary is known as "the healthiest coral reef in the tropical western Atlantic." Its unique ecology makes it a destination for thousands of divers and fishers each year. [23]

The National Marine Sanctury System has a long history of robust science and research expeditions that inform natural resource management and have led to new discoveries of natural processes, shipwrecks, artifacts, marine life, and habitats. For example, the Monterey Bay National Marine Sanctuary is a major site for scientific research that informs natural resource management. The Sanctuaries also offer educational experiences that connect people to natural, historical and cultural resources.

In addition to the direct contributions, the National Marine Sanctuaries contribute to coastal economies through fishing and tourism, they also provide a multitude of indirect benefits and support a wide variety of intrinsic values. For example, through the stakeholder engagement process, they may be able to reduce user conflicts.[24] In addition, marine protected areas can also achieve important human welfare goals through improvements in food security and empowerment of local communities.[25] Marine resources found in our nation's marine sanctuaries support food security for millions of people via commercial and subsistence fishing. National Marine Sanctuaries also encourage responsible tourism and recreation and help visitors develop a sense of stewardship and place-based conservation.[26] These areas are far more valuable than the potential value generated from oil and gas development.

OFFSHORE DRILLING IS INCOMPATIBLE WITH PROTECTING CALIFORNIA'S COAST

California has not seen new leasing in federal waters in over 40 years, but the legacy of destruction caused by those leases led to widespread opposition and state laws making clear that

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[22] National Marine Sanctuary Foundation, *Chumash Heritage*, Chumash Heritage, https://marinesanctuary.org/sanctuary/chumash-heritage/ (last visited Jan. 16, 2026).
[23] NOAA, *National Marine Sanctuaries and Local Economies*, https://sanctuaries.noaa.gov/science/socioeconomic/factsheets/welcome.html (last visited June 5, 2025).
[24] Jorge A. Angulo-Valdés and Bruce G. Hatcher, *A New Typology of Benefits Derived From Marine Protected Areas*, 34 Marine Policy 635 (2010), https://www.sciencedirect.com/science/article/abs/pii/S0308597X09001882.
[25] Michael Mascia et al., *Impacts of Marine Protected Areas on Fishing Communities,* 24 CONSERVATION BIOLOGY 1424 (2010), https://www.researchgate.net/publication/44634972_Impacts_of_Marine_Protected_Areas_on_Fishing_Communities
[26] Rachel Plunkett, NOAA, *How National Marine Sanctuaries Fuel Local Economies* (Jan. 2025), https://sanctuaries.noaa.gov/news/2025/sanctuaries-fuel-local-economies.html.

offshore drilling is not welcome in California. The risks to California's ecosystems, economy, and cultural resources are simply too high to warrant new lease sales in the area.

1. Leasing History and State Laws

The Department of the Interior held eleven lease sales between 1963 and 1984 in the Pacific Region, issuing 470 total leases.[27] Today, there are only 30 active leases remaining in the Pacific OCS, all in the Southern California Planning Area.[28] All of the remaining platforms are near their end of life, with the youngest platform being older than 30 years old.[29] For good cause, these areas have not been included in any final five-year program for nearly 40 years.[30]

California has also unequivocally opposed new leasing and codified that position in state law. In 1994, the state banned new oil and gas leasing in state waters.[31] In 2018, the state prohibited the issuance of leases or other conveyances to authorize any new construction of oil and gas infrastructure to support new federal oil and gas leases.[32] Together, these laws make clear that California does not want more drilling off its coast.

2. State and Local Opposition

At the lease sale stage, Governors and executives of affected local government may submit recommendations on the size, timing, and locations of proposed lease sales.[33] BOEM must then accept those recommendations if the agency determines that "they provide a reasonable balance between the national interest and the well-being of the citizens of the affected State."[34] Although these requirements begin after the notice of a proposed lease sale, BOEM should consider all of the opposition already expressed at the state and local level in California when deciding whether to move forward with leasing in California.

There has been consistent opposition to drilling in the OCS off California. During the Draft Proposed Program (DPP) comment period on the 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program, the California Congressional Delegation sent the Administration a letter expressing their strong opposition to any attempts to expand offshore oil

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[27] Letter from Christopher Potter, Program Manager to California Ocean Protection Council (Jan. 31, 2018), https://opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180131/hold/Item4_Resolution_on_Offshore_Oil_and_Gas_Leasing_FINAL.pdf.

[28] BOEM, *Managing Oil and Gas Leases – Pacific*, https://www.boem.gov/regions/pacific-ocs-region/oil-gas/managing-oil-and-gas-leases-pacific (last visited Jan. 22, 2026).

[29] Heather Richards, *Why Interior could get stuck with the tab for cleaning up oil platforms*. E&E News (Apr. 12, 2024), https://www.eenews.net/articles/why-interior-could-get-stuck-with-the-tab-for-cleaning-up-oil-platforms/.

[30] The areas were included as part of the 1987-1992 Five Year-Program, but the California leases were cancelled by President George H.W. Bush. Oil & Gas Journal, *Bush Orders Cancellation of Eight Controversial Offshore Lease Sales* (July 2, 1990), https://www.ogj.com/drilling-production/drilling-operations/article/17214615/bush-orders-cancellation-of-eight-controversial-offshore-lease-sales.

[31] California Coastal Sanctuary Act, AB 2444 (1994)

[32] SB 834; AB 1775 (2018).

[33] 43 U.S.C. § 1345(a).

[34] 43 U.S.C. § 1345(c).

and gas drilling off of the entire California coastlines.[35] The California Legislative Central Coast Caucus (CLCCC) also sent a letter to BOEM urging the removal of California from the Plan.[36] Further, the Governors of California, Oregon, and Washington wrote a letter to BOEM to "vehemently oppose the include of any new oil and gas lease sales of California's coast as proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program."[37] Further, the Pacific Fishery Management Council,[38] the California Fish and Game Commission,[39] the California Natural Resources Agency[40] have all submitted letters opposing the expansion of offshore drilling off of California.

Public opposition to offshore drilling was widespread during the DPP. The Environmental Defense Coalition (EDC) submitted a letter representing 46 California groups against the expansion of offshore drilling off California's waters. Twenty-five local resolutions against expanded offshore drilling through the Draft Proposed Program have been passed in California's cities or counties. Further, a series of "People's Hearings" were convened across California's coastal communities in response to the DPP. At these events, community members have gathered to show their support for protecting California from new offshore oil and gas development. Events have been held in San Diego (December 4, ~200 attendees), Orange County (December 8, ~100 attendees), Sacramento (January 6, ~80 attendees), Monterey (January 9, ~300 attendees), Santa Barbara (January 16, ~200 attendees), Sausalito (January 16, ~100 attendees), and Eureka (January 18, ~225 attendees).

Prior to the comment period on the DPP, the Request for Information (RFI) comment period, open from April 30, 2025 to June 16, 2025, resulted in widespread opposition.[41] During the RFI process, Governor Newsom wrote a letter to express opposition to expanded oil and gas exploration, development, and production off the California coast[42] The Attorney General of California signed a joint letter with the Attorneys General from Maine, Massachusetts, Maryland,

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[35] Letter from California Delegation (December 4, 2025), https://www.padilla.senate.gov/wp-content/uploads/Sen-Padilla-and-HNR-RM-Huffman_CA-Delegation-Letter-to-POTUS-and-DOI-re-Offshore-Drilling-Plans.pdf.
[36] Letter from the California Legislative Central Coast Caucus (November 24, 2025), https://usa.oceana.org/wp-content/uploads/sites/4/2025/12/California-Central-Coast-Caucus-5YP-Opposition-Letter-2.pdf.
[37] Letter from the Governors of California, Oregon, and Washington (January 23, 2026), https://usa.oceana.org/wp-content/uploads/sites/4/2026/01/CA-OR-WA-Offshore-Drilling-Letter_1.23.26-1.pdf.
[38] Letter from the Pacific Fishery Management Council (January 23, 2026), https://usa.oceana.org/wp-content/uploads/sites/4/2026/01/pfmc-comment-letter-on-oil-and-gas-leasing-program.pdf.
[39] Letter from the California Fish and Game Commission (January 23, 2026), https://usa.oceana.org/wp-content/uploads/sites/4/2026/01/LTR_CFGC-to-BOEM_11th-OCS-Draft-Prop-Prog_012326.pdf.
[40] Letter from the California Natural Resources Agency (January 23, 2026), https://usa.oceana.org/wp-content/uploads/sites/4/2026/01/BOEM-11th-OCS-Oil-and-Gas-Leasing-Program-Comment-Letter_CNRA_2025_FINAL_1.23.26.pdf.
[41] BOEM. (n.d.). *National OCS Oil and Gas Leasing Program.* https://www.boem.gov/oil-gas-energy/national-program/national-ocs-oil-and-gas-leasing-program.
[42] Letter from the Governors of California (January 23, 2026), https://usa.oceana.org/wp-content/uploads/sites/4/2025/10/BOEM-OCS-Comment-Letter_California_Governor-Newsom_2025-0015-1.pdf.

Delaware, New Jersey, New York, Oregon, Rhode Island, and Washington to urge for the exclusion of offshore drilling along their coasts.[43]

In California, opposition to offshore oil and gas leasing was widespread along the entire coastline during the RFI comment period. Twenty California-based organizations—from San Diego to Santa Barbara to the Bay Area—submitted a 26-page joint letter, citing the damaging impacts of past offshore oil and gas development, including the 1969 Santa Barbara oil spill, the 2015 Refugio oil spill, and the 2021 Huntington Beach pipeline leak.[44] Alongside this sign-on letter, ten individual organizations submitted individual letters and 13 municipalities voiced concern about risks to coastal communities, such as harm to tourism, property values, fisheries, and thousands of jobs. Other notable letters came from Congresswoman Julia Brownley,[45] Lieutenant Governor Eleni Kounalakis, [46] and the Central Coast Caucus.[47]

3. A History of Devastating Oil Spills

The reason for the widespread opposition is clear. Oil spills are inevitable and affect the thriving ocean ecosystems and economies. California has suffered repeated oil spill disasters, so it knows all too well the dangers of offshore drilling. On January 28, 1969, an offshore drilling platform blowout in the Santa Barbara channel released as much as 4.2 million gallons of crude oil into the ocean over 11 days. The spill occurred in vital seabird habitat, killing 3,700 sea birds that were recovered and likely many more that were never found. Oil from the incident traveled at least as far south as Mexico.[48]

In 2015, the same stretch of coastline suffered another major oil disaster when a pipeline rupture released over 142,000 gallons of crude onto Refugio State Beach and the surrounding environment. The spill devastated both marine and coastal ecosystems, impacting roughly 2,200 acres of subtidal and fish habitat and 1,500 acres of shoreline, including sandy beaches and rocky intertidal zones. Hundreds of birds, pinnipeds, and cetaceans were killed or injured, while kelp, seagrasses, invertebrates, and fish were also harmed. Ocean currents carried tar balls as far south as Los Angeles County, and the timing of the spill forced beach and fishery closures just before

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[43] *The Attorneys General of Maryland, California, Delaware, Maine, Massachusetts, New Jersey, New York, Oregon, Rhode Island, and Washington.* (June 16, 2025). https://usa.oceana.org/wp-content/uploads/sites/4/2025/10/Request-for-Information-and-Comments-on-the-Preparation-of-the-11th-National-Outer-Continental-Shelf-Oil-and-Gas-Leasing-Program-2.pdf

[44] Environmental Defense Center (June 16, 2025). *20-California Organization Letter Opposing Expanding Offshore Drilling.* https://usa.oceana.org/wp-content/uploads/sites/4/2025/10/2025_06_16_EDC-et-al-letter-re-2025-OCS-Leasing-Program-1.pdf.

[45] Letter from Congresswoman Julia Brownley (June 16, 2025), https://www.regulations.gov/comment/BOEM-2025-0015-25361.

[46] Letter from the California Lieutenant Governor (June 23, 2025), https://www.regulations.gov/comment/BOEM-2025-0015-25328.

[47] Letter from the California Legislative Central Coast Caucus (June 24, 2025), https://www.regulations.gov/comment/BOEM-2025-0015-25373.

[48] NOAA Office of Response and Restoration, *45 Years after the Santa Barbara Oil Spill, Looking at a Historic Disaster Through Technology*, (Nov. 8, 2022), https://response.restoration.noaa.gov/about/media/45-years-after-santa-barbara-oil-spill-looking-historic-disaster-through-technology.html.

Memorial Day weekend, resulting in more than 140,000 lost recreational days and economic losses for local communities.[49] The 1969 Santa Barbara and 2015 Refugio Beach spills together impacted over 90 miles of coastline and 935 square miles of ocean, an area almost twice the size of the city of Los Angeles. These repeated spills show the ongoing risks to coastal communities and ecosystems. Expanding the footprint of offshore drilling would only increase those risks.

4. Marine Economy and Fisheries

California faces significant risk from the threat of offshore drilling. California, the world's fourth-largest economy,[50] is supported by industries reliant on a healthy ocean. This sector supports over 511,000 jobs and generates $51.3 billion to the gross domestic product (GDP). Coastal tourism produces nearly half of this GDP, [51] supports over $11.7 million in wages, and employs more than 343,000 Californians.[52] The commercial fishing industry is a vital component of the state's economy, supporting over 187,000 full-and part-time jobs, generating $31.2 billion in sales and $6.6 billion in yearly income for fishers. California's recreational fishing industry supports nearly 5,800 jobs and $333 million in income.[53]

***5.* Habitat and Biodiversity**

The California Current Large Marine Ecosystem (CCLME) hosts a globally important concentration of large migratory marine wildlife. The cold, nutrient-rich waters are a highway for migrating whales and birds, as well as a destination for a wide suite of sharks, whales, dolphins, seabirds, sea turtles, and important game fish that come to feed in the rich productive Pacific Ocean waters. Protected areas include designated critical habitats for humpback whales, Southern Resident killer whales, Pacific leatherback sea turtles, green sea turtles, southern green sturgeon, and black abalone, with black abalone critical habitat extending along the central California coasts, including Farallon Islands, and around parts of the Channel Islands.[54] Sensitive seafloor habitats, such as coral and sponge gardens, thrive along the continental shelf, slope, and

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[49] California Department of Fish and Wildlife et al., *Refugio Beach Oil Spill Final Damage Assessment and Restoration Plan/Environmental Assessment* (2021).
[50] State of California, California is now the 4th largest economy in the world Governor of California (Apr 24, 2025), https://www.gov.ca.gov/2025/04/23/california-is-now-the-4th-largest-economy-in-the-world/ (last visited Jan. 22, 2026).
[51] NOAA, *2024 U.S. Marine Economy Report*, https://coast.noaa.gov/data/digitalcoast/pdf/econ-report.pdf.
[52] National Oceanic and Atmospheric Administration, Office for Coastal Management. Coastal America: A Demographic and Economic Picture. 2025 Monterey, CA: Center for the Blue Economy.
[53] NOAA, *Fisheries Economics of the United States 2022* (April 2024), https://spo.nmfs.noaa.gov/sites/default/files/TMSPO248.pdf.
[54] 50 C.F.R. § 226.221(c)

deep-sea areas,[55] while pelagic zones are vital for primary production and species like krill, forage fish, salmon, sea lions, and squid.[56]

Coastal habitats are particularly vulnerable to the risks of an oil spill, threatening seals, sea lions, sea otters, salmon and abalone, and ecosystems such as seagrass beds, kelp forests, and rocky reefs.[57] Notably, the all waters off the coast of California up to 3500 meters in depth are designated as Essential Fish Habitat under the Magnuson-Stevens Act,[58] and all seagrass, canopy kelp, rocky reefs, estuaries, and other areas of interest are designated as Habitat Areas of Particular Concern.[59] Sensitive wetlands, including estuaries and marshes, are also at high risk of oil spills, which can smother and poison marsh plants and animals, leading to long-term damage that may take decades to recover.[60] Additionally, climate change will likely result in saltmarsh loss from coastal squeeze due to sea level rise and increased storminess.[61]

California is also home to species listed as endangered or threatened under the Endangered Species Act (ESA). Protected species include marine mammals (like the vaquita, fin whales, blue whales, gray whales, humpback whales, killer whales, North Pacific right whales, sei whales, sperm whales, Steller sea lions, and the Guadalupe fur seals),[157] sea turtles (green sea turtles, leatherback sea turtles, loggerhead sea turtles, and olive ridley sea turtles are all found in the Pacific Ocean),[158] and even the endangered white abalone.[62] NOAA designated critical habitat in these waters for Steller sea lions, Southern Resident killer whales, humpback whales, the Pacific leatherback sea turtle, the green sea turtle, green sturgeon, and Chinook salmon.[159] The California coast is a feeding ground for endangered blue, fin, humpback , and sperm whales. Opening these areas to offshore oil and gas activities would degrade marine environments and harm already vulnerable species and habitats.

In 2024 and 2025, Oceana conducted three research expeditions documenting ocean biodiversity in waters surrounding California's Channel Islands. The first two expeditions alone identified

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[55] National Marine Fisheries Service - Office of Habitat Conservation, *The State of Deep-Sea Coral and Sponge Ecosystems of the United States* 113-114 (2017), https://repository.library.noaa.gov/view/noaa/17609/noaa_17609_DS1.pdf.

[56] NOAA Fisheries, *California Current Integrated Ecosystem Assessment,* https://www.integratedecosystemassessment.noaa.gov/regions/california-current/california-current-ecosystem-component-coastal-pelagic-species (last visited Jan. 22, 2026).

[57] NOAA Office of Response and Restoration, Using Science to Restore Polluted Coastal Environments on the West Coast (Dec 5, 2024), https://blog.response.restoration.noaa.gov/using-science-restore-polluted-coastal-environments-west-coast.

[58] Pacific Coast Groundfish Fishery Management Plan for the California, Oregon, and Washington Groundfish Fishery, Pacific Fishery Management Council 102-04 (June 2025), https://www.pcouncil.org/documents/2022/08/pacific-coast-groundfish-fishery-management-plan.pdf/.

[59] *Id.* at 107.

[60] Jacqueline Michel et al., *Oil Spills in Marshes: Planning and Response Considerations* (Mar. 2022), https://response.restoration.noaa.gov/sites/default/files/Oil_Spills_in_Marshes.pdf.

[61] Neil Saintilan et al., *Constraints on the adjustment of tidal marshes to accelerating sea level rise*, 377 *Science* 523 (July 2022), https://www.science.org/doi/10.1126/science.abo7872.

[62] NOAA Fisheries, *White Abalone*, https://www.fisheries.noaa.gov/species/white-abalone (last visited Feb. 19, 2026).

more than 13,000 unique species using cutting edge environmental DNA (eDNA) analysis.[63] Many species identified are poorly understood or undescribed by science. These findings affirm waters of Southern California host globally significant biodiversity and illuminate the need to better understand complex ocean ecosystems to create stronger and more effective wildlife protections.

6. **Cultural and Community Value**

The coastal and ocean waters off California hold immense cultural significance for many groups, including federally recognized Tribes, recreational and commercial fishermen, and recreational users such as scuba divers, surfers, and swimmers. These waters provide food, transportation, recreational opportunities, and sacred cultural and spiritual connections. BOEM has identified 2,383 coastal cultural resources at risk from future offshore development, including 683 archaeological sites, 1,719 built environment resources, and 78 culturally significant properties off the West Coast, including California.[64] Protecting these waters is essential to preserving their cultural, historical, and ecological value.[65]

The balance of factors BOEM must weigh does not support expanded oil and gas exploration and development off California. Oceana urges BOEM to exclude the California planning areas from any proposed program.

7. **National Security Risks**

BOEM recognizes military activities as multiple use conflicts, and national security experts make clear that offshore drilling is incompatible with our national security needs. In the waters off of California, training facilities such as Marine Corps Base Camp Pendleton and the San Clemente Island Range Complex serve as primary training areas for the Pacific Fleet, enabling live-fire exercises, tactical training, and research and development for the Navy, Marine Corps, and other military branches.[66] The Naval Amphibious Base Coronado, one of only two Navy amphibious training bases in the U.S., trains U.S. Navy SEALs and supports over 30 tenant commands, utilizing 5,500 yards of Pacific Ocean and bayside shoreline for essential operations.[67]

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[63] Adrian Munguía-Vega et al., *Environmental DNA Analysis of Marine Biodiversity in the Northern Channel Islands, California: Oceana and Blancpain Expedition* (Feb. 2025), https://usa.oceana.org/wp-content/uploads/sites/4/2025/02/eDNA_Results_Expedition-1_Final_2-5-25.pdf.

[64] ICF International et al., *Inventory and Analysis of Coastal and Submerged Archaeological Site Occurrence on the Pacific Outer Continental Shelf*, (Nov 2013) at 2, https://www.boem.gov/sites/default/files/environmental-stewardship/Environmental-Studies/Pacific-Region/Studies/pc-11-01.pdf.

[65] Oceana, *Opposition to New Offshore Drilling in the Pacific Ocean*, https://usa.oceana.org/pacific-drilling/ (last visited June 4, 2025).

[66] San Clemente Island, About SCI, https://www.scisland.org/aboutsci/navytraining/navytraining.html (last visited June 4, 2025).

[67] United States Navy Naval Amphibious Base Coronado, https://cnrsw.cnic.navy.mil/Installations/NAVBASE-Coronado/About/Installations/Naval-Amphibious-Base-Coronado/ (last visited Jan. 22, 2026).

In a letter to the Administration, the California Congressional Delegation cite their waters as "strategically vital" for military installations, routes, and airspace operations. They state that oil and gas development and the possibility of a spill could "undermine military readiness and pose risks to national security."[68]

CONCLUSION

Oceana strongly recommends BOEM abandon its misguided and illegal efforts to lease off the coast of California. Doing so before any California planning area is included in a finalized Five-Year Program is illegal. The areas are also protected from leasing because they were previously withdrawn under Section 12(a) of OCSLA, and the areas in or near National Marine Sanctuaries must be excluded from consideration. And leasing in these areas is simply a bad idea. California's waters are home to rich biodiversity and support a thriving economy. Expanded offshore oil and gas activities are incompatible with protecting California's important resources.

Sincerely,

Joseph Gordon
Campaign Director
Oceana

[68] Letter from California Delegation (December 4, 2025), https://www.padilla.senate.gov/wp-content/uploads/Sen-Padilla-and-HNR-RM-Huffman_CA-Delegation-Letter-to-POTUS-and-DOI-re-Offshore-Drilling-Plans.pdf.