# COUNTY OF HUMBOLDT
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Jan. 23, 2026

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

**RE: Comments on the Draft Proposed Program for the 11th National OCS Oil and Gas Leasing Program, Docket ID: BOEM-2025-0483-0001**

Dear Ms. Hammerle:

On behalf of the Humboldt County Board of Supervisors, we submit these comments in strong opposition to BOEM's Draft Proposed Program (DPP) for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program. On Oct. 7, 2025, the Board adopted Resolution No. 25-150, opposing any new or expanded offshore oil and gas drilling and deep seabed mining, and urging federal and state decision-makers to permanently prohibit such activities in all U.S. waters, including the Pacific Ocean off California. This builds upon our Feb. 27, 2018 Resolution No. 18-13, which opposed Pacific Coast inclusion in BOEM's leasing programs because such action threatens the regional clean-coast economy.

The 11th Program's proposal for six Pacific Region lease sales poses unacceptable risks to our coastal economy, marine environment, public health, Tribal cultural resources, and climate stability. We urge BOEM to fully exclude the Pacific OCS Region, including the California coast, from further analysis in the 11th National Program.

**I. Executive OCS Withdrawal and Legal Authority**
As a matter of public record, on Jan. 6, 2025, a permanent Executive OCS Withdrawal was issued under Section 12(a) of the OCS Lands Act (43 U.S.C. § 1341(a)), withdrawing from disposition all unleased federal waters along the U.S. Atlantic, Pacific, and Florida Gulf Coasts, inclusive of the entire Humboldt County coastline. This withdrawal protects these waters from offshore oil and gas leasing for a time period without specific expiration. All Pacific Coast OCS Planning Areas in the DPP are clearly included in this permanent Executive OCS Withdrawal. Thus, consideration of any tracts within these Executive OCS Withdrawals is outside the purview of BOEM, and we urge BOEM to fully exclude the Pacific OCS Region from the 11th National Program.

Although BOEM claims its DPP has been published in accordance with Section 18 of the OCS Lands Act and implementing regulations (30 CFR part 556), the agency's rushed wholesale area-wide approach to blanket leasing appears legally flawed. The DPP fails to comply with longstanding state and federal laws and policies, including the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), the Marine Mammal Protection Act (MMPA), the National Marine Sanctuary Act (NMSA), the Coastal Zone Management Act (CZMA), the National Historic Preservation Act (NHPA), and the Migratory Bird Treaty Act (MBTA). The DPP also fails to address the laws, goals, and policies of affected states and local governments as required under federal law.

**II. Critical Balancing Violation and Federal Consistency**
Broad swaths of the federal OCS Leasing Program were already recently deleted from Interior's drilling consideration under political pressure—the Atlantic Coast, the Pacific Northwest (Oregon and Washington), and parts of Florida's waters. The DPP appears to violate the "critical balancing" requirements of the OCS Lands Act by placing an obviously disproportionate burden of adverse impacts on California's shoreline communities compared to other OCS regions, essentially forcing California's affected local governments to unwillingly sacrifice their longstanding duly-adopted coastal protection and climate mitigation priorities. The required balancing of environmental risks and economic benefits among OCS regions clearly stipulates equivalent consideration of similar protective treatment for the California Coast.

California has a federally approved Coastal Zone Management Program (CZMP), which will eventually compel the state to exercise its duly held authority over any federal action that directly affects the land and water uses of California. When Interior's proposed offshore OCS leasing process goes forward, the State of California and its coastal local governments will appropriately raise Federal Consistency to protect their intrinsic rights under the CZMA. Humboldt County, along with all California counties, has a duly enacted Local Coastal Plan (LCP), which is a subset of the California Coastal Plan, formulated under the auspices of the federal CZMA. Our priorities for managing our jurisdictional authority along the California coast reflect ecosystem and fisheries sustainability, public access, and maintenance of a growing clean-coast economy. We request that these protocols be respected and that Interior forgo leasing for oil and gas off the California coast.

**III. Climate Change, Public Health, and Recent Executive Orders**
President Trump's January 20, 2025 "Unleashing American Energy" executive order and April 24, 2025 "Unleashing America's Offshore Critical Minerals and Resources" executive order promoting offshore extraction fail to account for catastrophic risks. An Oceana analysis found that protecting all unleased federal waters from offshore drilling could prevent over 19 billion tons of greenhouse gas emissions—equivalent to removing every car in the nation from the road for 15 years. Expanding offshore fossil fuel extraction fundamentally contradicts climate crisis mitigation and clean energy transition efforts. California has been a national leader in climate action, and offshore drilling conflicts directly with the state's climate goals.

Offshore drilling causes air pollution from toxic emissions known to cause asthma, lung cancer, and other diseases, disproportionately affecting coastal communities. Past disasters—Deepwater Horizon, the 2015 Refugio Spill, and the 1969 Santa Barbara blowout—caused catastrophic impacts to human life, wildlife, coastal ecosystems, and local economies. Deep seabed mining authorized by recent executive orders would devastate marine ecosystems, fisheries, and coastal economies. The ocean produces half our oxygen, absorbs excess carbon, and plays critical roles in weather patterns—industrial extraction threatens these essential functions.

**IV. National Marine Sanctuaries and Prohibited Activities**
The DPP threatens California's five national marine sanctuaries established to protect waters from industrial activities like offshore drilling. Two Central California sales (2027, 2029) threaten Monterey Bay, Greater Farallones, and Cordell Bank sanctuaries. Three Southern California sales threaten Channel Islands and Chumash Heritage sanctuaries. National Marine Sanctuaries prohibit new oil and gas exploration under the NMSA. As BOEM's March 30, 2025 Federal Register Notice acknowledges, sanctuaries designated as of July 14, 2008 are withdrawn from leasing without expiration.

Every National Marine Sanctuary has Designation Documents, Management Plans, and Site Regulations containing strict prohibitions on offshore oil and gas leasing and related activities. The overarching regulatory framework lists as prohibited or otherwise regulated activities:

(1) Exploring for, developing, or producing hydrocarbons within the Sanctuary;
(2) Exploring for, developing, or producing minerals within the Sanctuary;
(3) Discharging or depositing from within or into the Sanctuary any material or other matter, except as narrowly identified;
(4) Discharging or depositing from beyond the boundary of the Sanctuary any material or other matter that subsequently enters the Sanctuary and injures a Sanctuary resource or quality; and
(5) Drilling into, dredging, or otherwise altering the submerged lands of the Sanctuary, or constructing or placing any structure, material, or other matter on or in the submerged lands, except as incidental and necessary for certain narrowly authorized purposes.
Monterey Bay National Marine Sanctuary (established 1992) covers 6,094 square miles along 276 miles of coastline, protecting the Davidson Seamount and the 2½-mile-deep Monterey Bay Submarine Canyon. It hosts 36 marine mammal species including Blue, Humpback and Grey whales, over 180 seabird species, at least 525 fish species, and countless invertebrates and algae. Visitor-serving industries in Monterey and Santa Cruz Counties generate $4.3 billion annually. The California Current Large Marine Ecosystem is among the world's most biodiverse marine regions. National marine sanctuaries and adjacent areas should never be considered for oil and gas development.

**V. Coastal Economy, Tribal Cultural Resources, and State Policy**
Reliance on coastal resources has been a foundation of Humboldt County's culture and economy for generations. Our fishing industry depends on pollution-free waters to deliver wild salmon, Dungeness crab, and shellfish worldwide. California's coastal economy generates tens of billions annually through tourism, recreation, fisheries, and ports. Humboldt County is at the forefront of offshore wind energy development, representing genuine paths toward energy independence and climate resilience. Offshore oil drilling would directly conflict with this emerging renewable infrastructure.

Protecting California's coastlines is essential for safeguarding Tribal cultural resources. Indigenous peoples have maintained deep cultural, spiritual, and subsistence connections

to coastal and marine resources for millennia. Offshore drilling threatens sacred sites, traditional gathering areas, and marine resources central to Tribal cultural practices and food sovereignty. Drilling in culturally important areas would desecrate Tribal heritage and violate government-to-government trust responsibilities.

California prohibits new oil and gas leasing in state waters due to unacceptably high damage risks. Opposition is strongly bipartisan—the Governor, Attorney General, State Senate, State Lands Commission, and numerous counties oppose new federal Pacific Ocean leases. No new federal offshore oil and gas leases have been granted off California since 1984—over 40 years. Under OCS Lands Act Section 18(a)(2)(F), BOEM must consider affected states' laws, goals, and policies. California's clear legal prohibition and comprehensive climate and coastal protection policies must receive substantial weight.

**VI. Program Deficiencies and Requested Actions**

The proposed sales make approximately 94% of the Pacific Region's estimated undiscovered technically recoverable oil and gas resources available—an unprecedented expansion representing dramatic reversal of decades of federal policy. Including California waters creates uncertainty for our coastal economy, undermines clean-energy development investor confidence, and signals fundamental disregard for state and local coastal resource authority. The program's "hurdle price" analysis fails to account for ecosystem services' non-market values, recreational uses, preserving one of the world's most spectacular coastlines' intrinsic value, and enormous climate change costs.

The Humboldt County Board of Supervisors respectfully but urgently requests that BOEM:

1. Remove all California waters from the Proposed Program and Final Program, consistent with the Jan. 6, 2025 Executive OCS Withdrawal and Areas Under Restriction parameters;
2. Exclude all national marine sanctuaries and adjacent waters from any oil and gas leasing consideration;
3. Work toward establishing permanent nationwide prohibition on new offshore drilling in all U.S. waters;
4. Prohibit deep seabed mining activities that would harm marine ecosystems, fisheries, and coastal economies;
5. Fully consider California and affected local jurisdictions' laws, goals, and policies per OCS Lands Act Section 18(a)(2)(F), including Local Coastal Plans;
6. Conduct comprehensive climate impact analysis including lifecycle greenhouse gas emissions;
7. Conduct meaningful government-to-government consultation with affected Tribal Nations and ensure Tribal consent before considering offshore activities in culturally significant areas;
8. Comply with all applicable federal laws including NEPA, ESA, MMPA, NMSA, CZMA, NHPA, and MBTA; and
9. Provide meaningful opportunities for additional public input and government-to-

government consultation before proceeding to the Proposed Program stage.

**VII. Conclusion**

The Humboldt County Board of Supervisors maintains steadfast opposition to any new or expanded offshore oil and gas drilling off California's coast. As expressed in Resolution No. 25-150, we oppose both new and existing offshore drilling and deep seabed mining. The DPP threatens the regional clean-coast economy relying on healthy ecosystems, fisheries, and visitor-serving industries. It poses unacceptable public health risks, threatens Tribal cultural resources, accelerates climate change, and undermines California's renewable energy leadership.

This position reflects both the legal constraints under current Executive withdrawal authority and the longstanding scientific, environmental, and economic rationale for safeguarding this region. While we recognize certain U.S. coastal areas have allowed limited offshore drilling, this country has also protected national treasures like Yosemite, Yellowstone, and national marine sanctuaries. We urge you to preserve the California Coastline's legacy and beauty for current and future generations.

As declared in Resolution No. 25-150, Humboldt County will participate in the Local Government OCS Coordination Program to work collaboratively with other jurisdictions protecting California's coastal communities, economies, and ecosystems. Thank you for considering these comments and for your commitment to meaningful public engagement.

Sincerely,

Elishia Hayes
Humboldt County Administrative Officer

cc: The Honorable Gavin Newsom, Governor of California; The Honorable Mike McGuire, California State Senator, District 2; The Honorable Chris Rogers, California State Assemblymember, District 2; The Honorable Alex Padilla, U.S. Senator; The Honorable Adam Schiff, U.S. Senator; The Honorable Jared Huffman, U.S. Representative, California's 2nd Congressional District; California Coastal Commission; California State Lands Commission