

OFFICE OF THE GOVERNOR

June 16, 2025

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

Dear Ms. Hammerle,

I write to affirm California's continued opposition to additional offshore oil and gas development in response to the Bureau of Ocean Energy Management's 11th National Outer Continental Shelf Oil and Gas (OCS) Leasing Program and request that the three OCS planning areas along California's coast be removed from the 11th National OCS Oil and Gas Leasing Program.

Over the last 50 years, California has repeatedly suffered the impacts of oil spills from offshore oil drilling. Beginning with the major oil spill off Santa Barbara in 1969 and continuing through the Refugio Oil Spill in 2015 and the Huntington Beach oil spills in 2021, these disasters have harmed our state's economy, its coastal communities, and our environment.

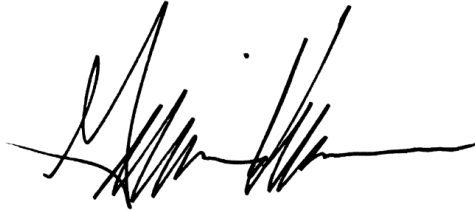
In response, bipartisan consensus against new oil drilling has been clear and consistent over five decades. This has resulted in current state laws that include a permanent ban on new offshore oil and gas drilling along our 1,110-mile coastline and a prohibition on new leases for oil and gas infrastructure in state waters that enable increased oil and gas production from federal waters.

The risk to our state economy, coastal communities and public health from new offshore oil and gas development is simply too high. California's offshore waters host a breadth of different economic uses competing for space and resources including military operations, marine transportation, telecommunications, commercial and recreational fishing, aquaculture, tourism and recreation.

Additional OCS oil and gas development would almost certainly conflict with a number of these activities.

Attached to this letter is further input from California's Natural Resources Agency regarding BOEM's 11th National OCS Oil and Gas Leasing Program.

Sincerely,

A handwritten signature in black ink, appearing to be "Gavin Newsom", with a long horizontal line extending to the right.

Gavin Newsom
Governor

June 16, 2025

Ms. Kelly Hammerle
Bureau of Ocean Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216
Submitted via: <http://www.regulations.gov>

RE: Comments for the 11th National OCS Oil and Gas Leasing Program, Docket No. BOEM-2025-0015

Dear Ms. Hammerle,

As Secretary of the California Natural Resources Agency, I provide these comments in response to the Bureau of Ocean Energy Management's (BOEM) Request for Information and Comments on the Preparation of the 11th Outer Continental Shelf Oil and Gas (OCS) Leasing Program, a notice of which was published at 90 Federal Register 17972 on April 30, 2025, Docket No. BOEM-2025-0015.

The California Natural Resources Agency (CNRA) protects, manages and restores the state's environment and its vast natural, cultural and historic resources. Our agency includes several departments with statutory jurisdictions relevant to this topic: California Coastal Commission, California Department of Conservation and its California Division of Geologic Energy Management; California Department of Fish and Wildlife, and the California State Lands Commission.

Expansion of oil and gas exploration, leasing, development and production within the three OCS planning areas offshore of California's coastline (Northern California, Central California, and Southern California) has long been opposed by the State of California due to the economic and environmental risk these activities pose.¹ On behalf of our agency and its constituent departments, I respectfully urge BOEM to remove the three OCS planning areas along California's coast from inclusion in the Pacific OCS Region in the 11th OCS Leasing Program.

This is not a partisan or geographic issue. California has remained steadfast in its opposition to offshore oil and gas development for decades based on data, information and experience. In 2006, 2008, and 2014, Republican and Democratic

¹ Please refer to the individual letters provided to BOEM by the California Natural Resources Agency and individual state natural resource management agencies in response to the 2018 OCS Draft Proposed Program.

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governors in California, Oregon, and Washington sent letters to the President of the United States and to Congress supporting moratoria on offshore oil and gas leasing and opposing any efforts to renew and expand oil and gas leasing off the entire West Coast. The economic and environmental risks of expanded offshore drilling are simply too great.

No new federal or state offshore oil and gas leases have been issued in California since the 1969 blowout of a well in the Santa Barbara Channel, which spilled an estimated three million gallons of crude oil into the Pacific Ocean. More recently, California has continued to suffer impacts from major oil spills along our coast associated with OCS operations, including the 2015 Refugio spill which released approximately 140,000 gallons of heavy crude oil along the Gaviota coast in Santa Barbara County and the 2021 dual offshore pipeline ruptures and spills offshore of Huntington Beach that released over 25,000 gallons of crude oil, contaminating Huntington Beach and Newport Beach shorelines in Orange County. These devastating most recent spills in southern California waters resulted in over 140,000 lost days for coastal recreation, tourism and beach use, with cascading consequences for coastal economies, communities, and local businesses.²

These numerous, repeated spills along California's coast and resulting damage to California's economy, tourism and recreation industries have fortified California's opposition to new offshore oil and gas development. Over the last four decades, California leaders have expressed consistent, united opposition to any new offshore oil and gas activities. In 1994, the California Coastal Sanctuary Act was passed into law, which prohibits new oil and gas leases off the coast in state waters. This state law found that new offshore oil and gas production in State's waters poses an unacceptably high risk of damage and disruption to the environment. Our State Legislature has also repeatedly passed resolutions opposing new offshore oil and gas development on a bipartisan basis.

Given this strong, consistent and codified opposition to new oil and gas development off the California coast, state agencies are positioned to oppose the construction or use of pipelines running through state waters to transport oil onshore from new leases in federal waters. State legislation passed in 2018 explicitly prohibits state agencies from issuing new leases or allowing oil and gas infrastructure within state waters associated with Pacific Outer Continental Shelf leases issued after January 1, 2018.³

Offshore Oil and Gas Development Poses Significant Economic Risks

California's offshore waters host a breadth of different economic uses competing for space and resources. Important activities occurring within the OCS include military operations, marine transportation, telecommunications, commercial and recreational fishing, aquaculture, tourism and recreation. Additional oil and gas development would almost certainly conflict with some of these activities, as described in more detail below.

² [Refugio Beach Oil Spill Final Damage Assessment and Restoration Plan/Environmental Assessment](#)

³ AB 1775: [Bill Text - AB-1775 State lands: leasing: oil and gas](#)

California's ongoing military operations (including Navy and U.S. Coast Guard training and testing and U.S. Space Force rocket launch and landing activities), marine transportation (including two of the nation's largest import terminals in the Ports of Los Angeles and Long Beach), offshore renewable energy development, and telecommunications (including seafloor fiber optic cables) industries would also be at risk of spatial conflicts and other adverse impacts from expanded OCS oil and gas exploration and development activities.

Fisheries are similarly at risk by offshore oil and gas development and potential oil spills. California is home to dozens of commercial fisheries that hauled in some 176 million pounds of catch worth nearly \$200 million in 2024, a significant contribution to national seafood production. Following the Refugio 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. Similar to coastal tourism and recreation sectors, California's fishing industry should not be put at risk by expanded development of the Pacific OCS regions.

Marine aquaculture is an increasingly important priority in California's state and OCS waters that can provide new jobs, business opportunities and meet the growing demand for seafood. California currently supports three existing open ocean operations comprising over 125 acres and additional projects covering over 2,000 additional acres. The U.S. Department of Energy's Advanced Research Projects Agency is actively funding efforts to develop and expand aquaculture operations offshore of California to produce shellfish and marine algae for use as food and biofuel production. Many of the locations that currently support existing marine aquaculture facilities and/or areas targeted for expansion of marine aquaculture, including portions of the Santa Barbara Channel and San Pedro Shelf (offshore of Long Beach), could be adversely affected by additional offshore leasing, surveying and development.

Tourism and recreation within California's coastal and offshore environments are essential to state and national economic interests. In 2021, California's marine economy supported over 26,000 businesses employing over 511,000 people, which accounted for \$26.7 billion in wages and \$51.3 billion in gross domestic product (GDP).⁴ From 2010 to 2016, California's coastal economy GDP outpaced the national average by nearly 2:1. Tourism and 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.

⁴ 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>

Offshore Oil and Gas Development Has Unacceptable Environmental Risks

California is home to one of the most diverse and highly productive coastal and ocean ecosystems in the world and supports a vast array of commercially important marine species, like Dungeness crab, and habitats including kelp forests, eelgrass beds, submarine canyons, offshore islands, and coastal wetlands. These ecosystems support thriving commercial and recreational fisheries, tourism and recreation, are culturally significant to many communities, and are critical to wildlife, and air and water quality.

In large part, the productivity of California's marine environment is due to the California Current Large Marine Ecosystem, which runs from the most southern point of California through northern Washington. The California Current Large Marine Ecosystem is one of the most productive upwelling systems in the world, pulling cold nutrient-rich waters from depth to the surface, fueling phytoplankton growth and driving exceedingly high diversity and abundance of invertebrates, fish, seabirds, and marine mammals.

California's valuable marine ecosystems and our network of state and federally protected areas would be at risk from expanded OCS oil and gas exploration and development. The increased likelihood and magnitude of oil spills, use of ecologically destructive high-energy exploration techniques, seafloor disturbance from extraction and pipeline placement, discharge of drilling debris and fluids, increased vessel traffic, and development of onshore and nearshore infrastructure all have the potential to significantly impact marine life and habitats. Furthermore, the release of air pollutants and emissions associated with oil and gas development, transport and refining would degrade local air quality, affecting the health of coastal communities.

Seismic Risks Increase Potential Environmental and Economic Impacts

The offshore region of California has a wide variety of geologic hazards that warrant careful characterization and analysis prior to placement of offshore facilities. California is one of the most seismically active regions in the United States, and strong to violent and even extreme seismic ground shaking is likely to impact the offshore region. Seismic shaking from these events can last for several minutes, increasing the damage to facilities. Offshore seismic sources include the San Andreas fault in northern California, the Hosgri-San Gregorio fault in central California, and a complex set of offshore faults including the Rose Canyon and Newport-Inglewood fault in southern California. These sources have the potential for large magnitude earthquakes in the range of magnitude 7 to 8 that can generate violent to extreme ground shaking. In the northernmost portion of California (Humboldt and Del Norte Counties), the Cascadia Subduction Zone is capable of seismic events up to magnitude 9 that can lead to the most extreme and damaging ground shaking.

Strong seismic shaking can trigger subaqueous landslides as well as turbidity flows that contain dense concentration of sediments. Hundreds of existing landslides have been mapped within and outboard of California's continental shelf. Ground failure from liquefaction of unconsolidated sediments can lead to sudden settlement and lateral spreading, leading to the loss of bearing support for structures. All of these hazards may impact offshore facilities, including pipelines and drilling platforms.

Major earthquakes at the Cascadia subduction zone and subduction zones elsewhere around the Pacific Ocean, can generate Tsunami. Also, earthquake-triggered subaqueous landslides within the nearby offshore setting can lead to damaging tsunamis.

Fault rupture can damage facilities, such as pipelines, that cross active faults. Since many offshore faults are capable of several meters of offset in a single event, fault rupture could cause severe damage where pipelines cross those faults. Many active faults, such as the San Andreas fault, experience major seismic events with large offsets every 200 to 300 years.

Specific Information from States: California's Coastal Management Programs

In the Federal Register Notice, BOEM requests information related to specific factors, including information from coastal states regarding the relationship between OCS oil and gas activity and the state's coastal zone management programs.

The California Natural Resources Agency includes many departments, boards, commissions, and councils responsible for natural resource management, including the Department of Conservation (which includes the California Geologic Energy Management Division), the Department of Fish and Wildlife (which includes the Office of Spill Prevention and Response), the Department of Parks and Recreation, the State Coastal Conservancy, the California Coastal Commission, the California Energy Commission, the California State Lands Commission, the San Francisco Bay Conservation and Development Commission, the Fish and Game Commission, the Native American Heritage Commission, and the Ocean Protection Council.

The California Coastal Commission, San Francisco Bay Conservation and Development Commission and the California Coastal Conservancy are the three state agencies that implement California's federally approved coastal management program. The California Coastal Commission has sole federal Coastal Zone Management Act authority over oil and gas leasing, exploration, development and production activities on the OCS. Consequently, the Coastal Commission will conduct a federal consistency review to determine the consistency of any proposed lease sales, exploration, production plans, and associated activities in federal waters with the enforceable policies of the California Coastal Act. The Coastal Commission has long opposed efforts to expand oil and gas leasing, exploration and production off the California coast, maintaining since the early 1980s that new offshore leasing would conflict with the California Coastal Management Program and compromise California's vital coastal economy.

Californians across the political spectrum have recognized this danger and joined together to address it by, among other things, enacting strong coastal protection laws and more recently, adopting ambitious mandates for clean energy use and emissions reductions. As stated in the letters provided to BOEM in response to the 2018 Draft Proposed Program, the state is committed to protecting California's coastal resources.

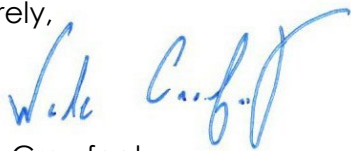
Looking Ahead

For decades, the State of California has been unwavering in its opposition to new offshore oil and gas development. The risks to California's vibrant and thriving coastal economy and environment from additional OCS oil and gas exploration and development far outweigh the potential benefits.

As the federal government proceeds with its plans for new or expanded oil and gas development offshore California, it is required to take into account California laws, goals and policies. (43 U.S.C. 1344(a)(2)(F).) This cannot justify imposing a course of action that California governors, legislators of both parties, and numerous state and local bodies have consistently opposed.

Given the significant economic and environmental risks associated with offshore oil and gas exploration and development, I urge BOEM to remove California from further consideration for new offshore oil and gas leasing as the 11th OCS Leasing Program is developed.

Sincerely,



Wade Crowfoot
Secretary for California Natural Resources Agency