



January 23, 2026

Submission via www.regulations.gov

Ms. Kelly Hammerle

Program Manager, National OCS Oil and Gas Leasing Program
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

**Re: Comment in Opposition to the Draft Proposed Program (DPP) for the 11th
National Outer Continental Shelf (OCS) Oil and Gas Leasing Program
(Docket No. BOEM-2025-0483)**

Dear Program Manager:

Please accept the following comments on behalf of San Diego Coastkeeper (Coastkeeper) regarding the above-referenced proposal from the Bureau of Ocean Energy Management (BOEM). Coastkeeper is a member-supported clean water advocacy nonprofit, established in 1995, whose mission is to protect and restore our coastal and inland waters for the communities and wildlife who depend on them.¹ We pursue our vision of swimmable, fishable and drinkable waters through a strategic mix of education, community science, grassroots community engagement and direct enforcement of clean water laws. Coastkeeper also supports and hereby incorporates by reference the comments submitted by the Waterkeeper Alliance.

Coastkeeper is absolutely opposed to the Draft Proposed Program (DPP) to issue new oil and gas leases off the coast of California. The resumption or initiation of offshore drilling along California's coast represents an existential threat to our collective ecological, social and economic well-being, with virtually no benefit to Californians or the incredibly diverse wildlife that call it home. Expansion of oil and gas drilling would also lead to increased use and emissions greenhouse gases, exacerbating the climate crisis on a global and local scale.

This offshore leasing proposal includes 34 potential lease sales that would open a broad swath of highly sensitive ocean areas, 21 in the pristine Arctic waters off Alaska, six along the coast of California, and seven in the Gulf. The areas subject to proposed leasing include the entire coast of California, which has been subject to a state imposed leasing moratorium since a catastrophic 1969 oil spill in Santa Barbara, waters off Florida's western coast that have been protected for decades, and areas off the coasts of Texas, Louisiana, Mississippi, and Alabama, which have

¹ Please see www.sdcoastkeeper.org for more information.



seen 99% of the fossil fuel industry's U.S. offshore leasing to date. Tens of millions of people depend on resilient coastlines, thriving marine wildlife, healthy fisheries, and clean beaches to protect them and keep their economies running. In addition, instead of embracing a clean energy future, this draft plan would continue to increase our dependence on fossil fuels, locking us into decades of harmful, future greenhouse gas emissions that will deliver even more extreme climate events.

The people of Southern California are familiar with the harms of oil spills. In 2021, an underwater pipeline ruptured off the coast of Huntington Beach, sending 25,000 gallons of crude oil into the area. The San Pedro Bay Pipeline rupture devastated birds and wildlife, shut down the beach, and led to a multimillion-dollar lawsuit.² Taking place during peak surfing season, the spill forced the closure of surf schools and rental shops, cancelled whale watching tours, and led to a temporary ban on recreational and commercial fishing. Even a relatively small spill like the San Pedro rupture demonstrates the huge economic risk of offshore drilling to California, where economic activity along the coastline contributes \$4 billion a year to the economy and employs over a half-million Californians.³

Oil and gas drilling would directly threaten the incredible network of Marine Protected Areas (MPA) established along California's coast following passage of the state's Marine Life Protection Act (MLPA) in 1999.⁴ Over a ten-year period, California established a network of 120 MPAs, stretching from the Oregon border to the international border with Mexico in San Diego.⁵ The overarching goal of MPAs was to preserve and protect marine coastal areas of exceptional value for current and future generations. MPAs are essentially marine national parks, created to protect biodiversity, fish and shellfish nursery or feeding habitat, and unique or threatened marine habitats, including kelp forests, rocky reefs, intertidal zones and others which form the foundation of a healthy coastal marine environment. In 2024, the California Department of Fish and Wildlife (CDFW) undertook a ten year 'decadal' review of the MPAs, to determine whether they were functioning as intended to protect marine habitats and species. Not surprisingly, the review showed that MPAs, when properly managed and used, increase biodiversity and density of fish stocks and serve to conserve critically important marine habitats.⁶

San Diego County is host to eleven MPAs, ranging from beloved surf beaches and waters in north San Diego County to the southernmost MPA at the Mexican border, established to protect coastal habitat adjacent to the Tijuana River Estuary. MPAs in San Diego contain diverse habitats, from kelp forests in Cabrillo to intertidal habitat and tidepools in La Jolla. Every single one of these MPAs, which took years of work and collaboration among diverse stakeholders,

²<https://www.latimes.com/california/story/2023-04-12/oil-pipeline-involved-in-2021-orange-county-spill-restarted>

³<https://www.latimes.com/california/story/2021-10-18/local-leaders-legislators-call-for-ban-on-offshore-oil-drilling>

⁴ See <https://californiampas.org/about-mpas/california-state-mpas>

⁵ *Id.*

⁶ *Id.*



would be at risk if oil and gas drilling leases were issued in federal waters off the coast of San Diego.

Oil and gas drilling would also represent a clear and present threat to our economic well-being in San Diego. Our city is known for its beautiful beaches, incredible recreation opportunities in Mission Bay, amazing offshore fishing grounds, and widely popular gray whale migration every winter, to name just a few of the natural attractions that bring visitors from all over the world to our beaches, bays and coastal waters. Coastal tourism is a multi-billion-dollar industry that depends on a clean environment to succeed. The threat and impacts of an oil spill pose an unwise, unwanted and unacceptable risk to our communities, marine ecosystems and wildlife which depend on them.

Coastkeeper urges BOEM not to issue any new leases off the coast of California. If this DPP goes forward, we will use every legal, policy and grassroots tool at our disposal to ensure that it fails.

Thank you for providing this opportunity for public comment.

Respectfully,

A handwritten signature in black ink that reads "Phillip Musegaas".

Phillip Musegaas
Executive Director