



C A L I F O R N I A
DEPARTMENT OF JUSTICE

March 30, 2026

Matthew Glacona
Acting Director
Bureau of Ocean Energy Management
1849 C Street NW
Washington, DC 20240
Sent via electronic submission

RE: Response to the request for comments on the Notice of intent to prepare a Programmatic Environmental Impact Statement

Docket No. BOEM-2025-0681

Dear Acting Director Giacona:

As stated in earlier comments submitted to this docket, the California Natural Resources Agency and California Attorney General's Office¹ vehemently oppose additional lease sales in California's Outer Continental Shelf ("OCS") planning areas and request that California be removed from consideration for additional offshore oil and gas development in the Proposed 11th National Oil and Gas Leasing Program ("Proposed Program").

The State of California's long-standing policy, under both Democratic and Republican Governors, has been in opposition to new or expanded offshore oil and gas leasing off its coast. The 1969 Santa Barbara oil spill from Union Oil's Platform A showed the devastation caused by offshore oil spills and led to a ban on any offshore leasing in state waters. Additionally, California has experienced five significant oil spills in recent years that resulted in devastating consequences to our economy, environment and communities.

The Department of the Interior last included the California OCS planning areas in the 1987-1992 program. However, because of Congressional and Presidential moratoria, and the consistent and united opposition of the West Coast states, there has been no leasing activity offshore California since 1984. Although, the moratoria against oil and gas leasing offshore California expired in 2008 and BOEM proposed to include California in the 2017-2022 leasing program, no lease sales were held before adoption of the 2024-2029 program, which once again excluded California.

¹ Attorney General Bonta submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State. See Cal. Const., art. V, § 13; Cal. Gov. Code, §§ 12511, 12600-12612; *D'Amico. v. Bd. of Medical Examiners*, 11 Cal.3d 1, 14-15 (1974).

These proposed OCS lease sales also overlap with several critical military training areas that are essential to the Department of Defense and are used by several military forces along California's coast for advanced military testing, training, and evaluation.

Previous letters submitted by California's resources agencies, and its state and local officials, including Attorney General Bonta and Governor Newsom, have made clear that there is no reasoned basis for including California's OCS in the Proposed Program nor for departing from the federal government's long-standing policy against lease sales in California's OCS. Additionally, the failure to complete a programmatic EIS for the Proposed Program is a significant departure from the approach taken over the past five decades of five-year programs, and without sufficient explanation.

If BOEM does include California in the Proposed Program and the draft PEIS, we again request that BOEM hold a series of public meetings, at least one in each region of our state, to allow the citizens of California an opportunity to express their views on expanded offshore oil and gas drilling off California's coast.

Additionally, if BOEM persists with the inclusion of California in the Proposed Program, BOEM should consider the following scoping comments on the Notice of Intent (NOI) to prepare a Programmatic Environmental Impact Statement (PEIS) that will accompany the Proposed Program.

To assist us in our review of proposed program elements, we request that the PEIS specifically address the following:

1. General

- a. Cumulative Impacts: The EIS should include analysis of the cumulative impacts associated with the maximum extent of oil and gas development from leasing of all six planning areas offshore California and nationwide that were included in the Draft Program. The EIS should also include an analysis of the cumulative impacts associated with both proposed and existing oil and gas activities in the OCS.
- b. Alternatives: The EIS should include analysis of a full set of feasible alternatives for additional oil and gas development on the OCS, including, at a minimum, a no action alternative that excludes California from the leasing program. In addition, BOEM should consider using the OCS for renewable energy development rather than oil and gas development. A renewable energy alternative is reasonable given the increasing demand for renewable energy and State policies that require the implementation of renewable energy as a measure to reduce greenhouse gas emissions.
- c. Scoping: BOEM has held no public meetings on the Proposed Program nor proposed any on the scope of this PEIS, despite all of California's coastline potentially impacted by OCS leasing. Such scoping is important to identify environmentally important areas that are used in consideration of mitigation measures and alternatives analysis. Meetings in affected communities would be consistent with BOEM's historic practice.

2. Consistency with applicable federal and state laws

- a. National Environmental Policy Act. Pursuant to NEPA, BOEM must fully analyze all direct, indirect, and cumulative impacts and a range of alternatives. The failure to complete a programmatic EIS earlier in the process, for the Proposed Program, runs contrary to several decades of practice by BOEM and is without sufficient explanation. BOEM has yet to explain how it intends to conduct an environmental analysis for the Proposed Program. The Proposed Program calls for leasing in other areas of the OCS, not just offshore California. Simultaneous leasing in multiple areas would have a dramatic cumulative environmental, social, and economic impact. Failure to conduct such analysis would risk violations of NEPA's requirements for informed decision-making and reasoned alternatives analysis.
- b. Coastal Zone Management Act and California Coastal Management Program consistency. In its role implementing California's federally approved coastal management program, the California Coastal Commission will conduct an independent and objective federal consistency review to determine the consistency of any proposed lease sales, exploration, and production plans, and associated activities in federal waters with the California Coastal Management Program. The enforceable policies of that program are the Chapter 3 policies of the California Coastal Act. Potential Coastal Act issues raised by the Proposed Program include: siting of hazardous industrial development; seismic and subsidence hazards; oil spills and release of other hazardous materials; protection of water and air quality; greenhouse gas emissions; noise; visual impacts; coastal recreation and public access; cultural resources; wetlands and other environmentally sensitive habitats; marine resources; and cumulative impacts. The Coastal Commission will rely in part on the information contained in the EIS in assessing the conformity of these activities with the Chapter 3 coastal resource protection policies.

A wide range of California's laws, goals, and policies should be considered by BOEM in making leasing decisions in California's planning areas. These include:

- c. Other applicable California laws and statutes.
 - i. Public Trust Doctrine: California holds and manages its sovereign tidelands and submerged lands in trust pursuant to the common law public trust doctrine and for the benefit of the People of California. Increased development on the OCS threatens the State's interest in these lands and the ability of its people to access and enjoy them.
 - ii. California Coastal Sanctuary Act of 1994 (Cal. Pub. Resources Code, § 6240 et seq.): Subject to certain narrow exceptions, the State created a coastal sanctuary which banned all oil and gas development in state waters subject to tidal influence because of the unacceptably high risk of damage and disruption to the marine environment of the State. The State's laws and policies mitigating the risk from an oil spill from state waters would be frustrated by increased development on the OCS.

- iii. California's Marine Protected Areas (Cal. Pub. Resources Code § 36710 and Cal. Code Regs. title 14, § 632): California created a network of 124 marine protected areas where fishing and other commercial activity is restricted or prohibited in recognition of the unique ecological and recreational interests of these areas. There are also 14 special closures where access is restricted to protect seabird and marine mammal nesting and resting spots from human disturbance. These areas and California's management of them would be threatened by oil and gas leasing on the OCS.
- iv. California's Preparation for Sea Level Rise (Cal. Pub. Resources Code § 6311.5): California has laws and policies encouraging local governments to prepare for sea level rise caused by climate change. This policy would be frustrated by increased hydrocarbon development from the OCS, the attendant increase in greenhouse gas emissions, and the resulting incremental increase in sea level rise caused by climate change.
- v. California's Climate Policies (Cal. Health and Safety Code § 38566): California has several laws and goals to reduce pollution, including a reduction in greenhouse gas emissions 40 percent below 1990 levels by 2030 and achieving carbon neutrality by 2045. The California Air Resources Board is empowered to broadly regulate emissions from stationary and mobile sources to meet this directive. Increased OCS development would increase greenhouse gas emissions from oil and gas drilling, refining, and transportation. This would frustrate California's ability to meet its greenhouse gas reduction goals and would harm the people and environment of California by increasing the negative effects associated with climate change.

3. Activities

At a minimum, the EIS should analyze impacts associated with the following activities associated with offshore oil and gas development:

- a. Exploration.
 - i. Underwater noise and associated disturbances: BOEM should include a thorough assessment of the underwater noise and other disturbances associated with offshore oil and gas surveys and exploration activities. This should include high-energy seismic surveys, vessel noise, and the cumulative impacts from an overall increase in ambient underwater noise in the marine environment.
 - ii. Injury to marine mammals and other wildlife: High-energy seismic surveys required for offshore oil and gas exploratory activities and subsurface seabed characterizations use air guns and other acoustic devices which have been shown to cause harm and adversely affect the behaviors of marine wildlife. These activities negatively impact marine mammals in several ways, from changing behaviors, to damaging tissues and hearing loss, and in some cases causing strandings and death. BOEM should include an assessment of these technologies and any anticipated high-energy seismic survey activities

and their potential to impact marine mammals, as well as other wildlife. BOEM should also analyze the potential impacts from high-energy seismic surveys on fishes and larvae to provide an accurate assessment of impacts to environmental resources other than marine mammals, especially those commercially important species relied on by California fishing communities.

- iii. High-energy seismic surveys and other geophysical studies. California is one of the most seismically active regions in the United States, and offshore seismic sources include a complex set of offshore faults, including the Rose Canyon and Newport-Inglewood fault in Southern California, and the Cascadia Subduction Zone, Mendocino Triple Junction, and the offshore northern terminus of the San Andreas Fault in Central and Northern California. Seismic shaking from these events can damage facilities, such as pipelines, that cross active faults. Offshore drilling activities, including exploratory wells, could exacerbate California's high likelihood of earthquakes and tremors, by triggering man-made earthquakes. BOEM should include an analysis of the impacts from oil and gas exploratory activities involving high-energy seismic surveys and well drilling.
- iv. Drilling exploratory wells: BOEM should include impact assessments for exploratory well drilling and any well stimulation activities and their associated effects on the marine environment, wildlife, and other ocean users.
- v. Onshore and offshore infrastructure needed to support exploration will impact the environment: Exploration activities require onshore and offshore infrastructure for support and operation, as well as increases in vessel transit to and from lease areas. This will also produce impacts to the environment, as well as local ports and harbors. BOEM should include an assessment of impacts to the marine environment, wildlife, and other ocean users from the required infrastructure to support exploration activities, as well as increased vessel traffic and congestion in ports and harbors.

b. Development.

- i. Construction of platforms, pipelines, onshore and offshore facilities for processing, refining, transportation or storage of oil and gas products: BOEM should assess how the construction of offshore oil and gas infrastructure will impact the environment, but also coastal communities where any construction activities or storage of equipment may take place along with telecommunication cable connection points servicing the Southern Cross Cable Network and Submarine Cable system along California's coast.
- ii. Drilling of wells: BOEM should assess how the drilling of wells will impact the coastal and onshore environment including habitat destruction, water and sediment contamination and air pollution. Drilling

operations introduce organic contaminants and heavy metals into the environment.²

- iii. Other onshore or offshore infrastructure needed to support oil and gas development: BOEM should assess how the transport and deployment of infrastructure needed for oil and gas development including, but not limited to, drilling rigs and platforms, production units, subsea equipment, gathering and processing systems, storage and transportation and support facilities.

c. Production.

- i. Operation and maintenance of wells, platforms, pipelines, processing and storage facilities, refining facilities
- ii. Hydraulic fracturing: BOEM should include analyses on the risks of hydraulic fracturing and the potential impacts from this activity, including induced seismicity in an already seismically-active area.
- iii. Handling of waste and wastewater
- iv. Transportation of crude and/or processed oil and gas to its final destination

d. Decommissioning.

- i. Plugging and abandonment of wells: BOEM should assess the potential impacts from plugging and well abandonment activities after oil and gas leases expire and decommissioning is required. BOEM has already identified idle wells that are only temporarily plugged off the coast of California. Additional leasing and development will only contribute to this issue and exacerbate the impacts.
- ii. Removal of structures including platforms, pipelines and onshore processing or refining facilities: Failure to decommission aging and non-operational oil and gas infrastructure offshore California is a widespread issue in coastal communities. The Bureau of Safety and Environmental Enforcement has identified at least eight idle offshore platforms that should be decommissioned, and allowing for additional offshore oil and gas leasing and develop will only contribute to this issue. BOEM should address the impacts of decommissioning and removing offshore oil and gas infrastructure and include the risk of oil companies abandoning their responsibilities to decommission, such as with Venoco abandoning its responsibility to decommission Platform Holly, and in doing so, creating public health and safety risks. In addition, BOEM should address the cumulative impact of adding more infrastructure to the California OCS when there are already several platforms that still require decommissioning.

² Muhammad Adnan, Baohua Xiao, Muhammad Ubaid Ali, Xianjin An, Impacts of drilling on soil and groundwater heavy metal pollution: A comprehensive review, *Environmental Chemistry and Ecotoxicology*, Volume 8, 2026, Pages 127-141, ISSN 2590-1826, <https://doi.org/10.1016/j.eneco.2025.11.015>.

- iii. Restoration of impacted areas: BOEM should also address the impacts from required restoration activities in the lease areas after all offshore oil and gas infrastructure is decommissioned and removed.
- e. Oil spills. Response and recovery from an oil spill results in significant financial costs for California. As an example, the overall costs from the 2015 Refugio Oil Spill, caused by the rupture of an onshore pipeline near Refugio State Beach in Santa Barbara County including anticipated legal claims, were estimated at \$275 million. Additionally, coastal and marine habitats and aquatic life were seriously impacted. The spill also resulted in significant adverse economic impacts to the state and county for lost tax revenue, federal royalties, worker's wages and tourism dollars while the pipeline and the offshore platforms it serves remain offline.
 - i. Catastrophic or large spills: BOEM should address the risks and potential impacts of catastrophic or large spills, as well as the increased likelihood of oil and gas infrastructure failure in the future due to the risk of seismic activity along the California OCS.
 - ii. Small spills: BOEM should also assess the risks and impacts from smaller spills, including from drilling and operational activities as well as from equipment or associated infrastructure.
 - iii. Clean-up activities: BOEM should include an assessment of the clean-up activities and the associated economic impacts, as well as space conflicts due to oil spill clean-up.
 - iv. Cumulative impacts: BOEM should assess the cumulative impacts from large spills, small spills, and the clean-up and restoration activities.

4. National Security Risks

The California coast is an integral part of Department of Defense training to ensure mission readiness and is supported by multiple military bases. California is home to the largest concentration of military forces in the nation with more than 32 major installations and 200,000 active and reserve component personnel as well as 124,000 national security employees. As part of its critical readiness and training mission, our military maintains three major active offshore range complexes and testing covering 156,000 square nautical miles off California's coast. The most active within that complex are twelve ranges in Southern California between San Diego and Ventura. The potential for expanded oil leases off the California coast presents significant additional risk to both military operations and readiness activities.

Any impediment to the training, testing or mobility of these forces due to offshore drilling operations or failures poses both unnecessary and unacceptable risk to naval operations, power projection and national security. These national security risks are bases for the removal of California from the 2025-2029 Proposed Program.

However, if BOEM chooses to move forward, BOEM should assess national security impacts in the EIS, including:

- a. Maritime impacts. The San Diego area alone houses more than 125,000 military personnel, including the U.S. Navy's Third Fleet with three active carrier strike groups and approximately 100 ships, 400 aircraft, and 68,000 personnel. This formation, along with the 55,000-member First Marine Expeditionary Force out of Camp Pendleton, forms the tip of the spear for U.S. response operations in the Pacific and is critical to countering potential threats worldwide. As of the date of these comments, one of these carrier groups is actively supporting Operation Epic Fury in the Arabian Sea and another is underway in the Pacific. The Navy, Marine Corps and Coast Guard stationed in California are critical to both national security and national defense. Their daily operations in California's coastal waters defend our nation's shoreline against a broad variety of local, national and transnational threats above, on, and below surface. The imposition of new oil infrastructure of any kind interdicts lanes of training, testing and mobility for these forces impacting not only daily operations but also force readiness due to training constraints.
- b. Ground impacts. Military installations take up more than 70 miles of California's 840- mile general coastline including 44 miles for Vandenberg Space Force Base and 17 miles for Camp Pendleton. These areas are critical for operations, training and testing. They also represent a critical percentage of accessible undeveloped coastline necessary for these operations. Vandenberg's shoreline provides critical standoff from civilian infrastructure and activities to support growing space launch operations. At Camp Pendleton the Marines of One Marine Expeditionary Force rely on shore access and beach ranges for continual training and readiness activities. This is where America trains its Marines on the West Coast. Not only would additional oil infrastructure potentially interdict these activities, but a major spill could shut them down entirely.
- c. Air and Space impacts. California's unique geography provides world class access to near continuous sea, air and land corridors for training and testing. This is critically important for the training and readiness of military aviation assets from all branches of service. This includes rotary, fixed wing and unmanned aircraft. All branches of military service in California maintain and routinely train with these assets over California's coastal and inland ranges. These corridors provide one of the few areas in the United States where forces can transit from the sea to long inland training corridors needed for fast moving aircraft. Interfering with or interdicting the maritime portion of these corridors with additional HAZMAT infrastructure significantly limits their capabilities and consequently the readiness of the forces that rely on them. The same is true for space operations where interference, interdiction or limitations posed by additional or renewed oil infrastructure and operations in the maritime range fan would create detrimental impacts to space launch and therefore military readiness.

As depicted in the attached map, among the specifically impacted installations and activities in California are the following:

Navy:

Naval Base Ventura County (including Point Mugu and Port Hueneme)
Naval Base San Diego
Naval Base Coronado (including NAS North Island and Naval Amphibious Base Coronado)
Naval Air Weapons Station China Lake
Naval Air Station LeMoore
Naval Base Point Loma
Naval Weapons Station Seal Beach

Marine Corps:

Marine Corps Base Camp Pendleton
Marine Corps Air Ground Combat Center Twentynine Palms (contiguous sea, air land exercises and training)
Marine Corps Air Station Miramar
Marine Corps Logistics Base Barstow (relies heavily on SoCal maritime ports)

Air Force:

Edwards Air Force Base (USAF training and testing installation)

Space Force:

Vandenberg Space Force Base

Coast Guard:

Coast Guard Sector San Diego

5. Other Potentially Affected Coastal Resources

At a minimum, the EIS should analyze potential impacts (temporary and permanent) including to the following coastal resources:

- a. Industrial and Other Economic Impacts
 - i. Ports and Harbors. California ports and harbors are an interdependent system that jointly facilitate economies of scale in large, long-distance cargo movements and near ocean use areas for commercial fishing, marine construction, mineral extraction, ocean research, recreational boating and public safety. California ports are among the busiest in the world, handling 40% of all containerized imports and 30% of U.S. exports. Any disruption from oil and gas operations, including offshore oil spills, could disrupt vessel traffic, delay cargo, and disrupt critical supply chains, hurting the U.S. economy. BOEM's analysis should address the potential for vessel traffic to be adversely affected along with any ocean space use conflicts between the marine transportation industry and any additional oil and gas development activities. California's port and harbor system includes large

deepwater port complexes on the Los Angeles/Long Beach Harbor, containing massive terminals for container ships, supertankers and large bulk carriers. Decentralized small deepwater ports are required as collection and distribution points for petroleum products, minerals, grain, forest products, and general cargo. Harbors are an outlet that allow businesses to realize the enormous resource potential in the ocean's rich coastal shelves. California's port and harbor system includes seven harbors on the State's coast, rivers and bays, from which significant exports originate. California ports represent \$416 billion in annual trade value and support 3.1 million jobs nationally. Port Hueneme is the only deep-water port between Los Angeles and San Francisco and serves as a critical dual-use military and commercial logistics node.

- ii. Space launch. Vandenberg Space Force Base is the second busiest spaceport in the world containing 99,604 acres of land and operating the 19th largest airfield runway in the world at 15,000 feet long. The installation provides a safe location for the testing of new and existing federal government sanctioned programs, as well operational mission fulfillment of national objectives. The launch and range capabilities provide the architecture and infrastructure necessary for the placement of satellites into polar earth and highly elliptical orbits, while concurrently retaining the ability to confidently test the Minuteman III ICBM and other strategic priorities for the country's national security interests. It is near reaching 100 or more launches annually, supports 950 direct employment jobs and 20,000 total direct, indirect and induced employment statewide. Vandenberg Space Force Base contributes \$3.5 billion to California's Gross Domestic Product (GDP) and has a total economic output of \$5.8 billion. More than ten companies currently launch from VSBFB, with many under contract with NASA and the Space Force for national security missions. Limiting or interfering with the launch and recovery range area in any respect through the addition or activation of offshore oil operations threatens to restrict both current and future launch operations and set back both significant commercial advances and critical national security requirements.
- iii. Tourism. Many coastal communities in California heavily rely on the coast and ocean for their tourist-based economies, which could be impacted by offshore drilling and exploration. Over 1.3 million passengers visited California via cruise ship at the Port of Los Angeles in 2023, with an expected increase in 2025. 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 GDP.³ From 2010 to 2016, California's coastal economy GDP outpaced the national average by nearly 2 to 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 and California's tourist-based economies.

- iv. Commercial and recreational fishing. Recreational fishing generated \$3.3 billion economic value in 2024. Commercial fishing generates approximately \$1.5 billion in annual economic value and supports 30,000 direct jobs. Coastal communities heavily rely on fishing for their economic stability.
 - v. Marine aquaculture. 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. 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.
- b. Recreation. California's coast and ocean is the cornerstone of our state's outdoor recreation economic output, which is ranked number one in the nation, and generated \$87.9 billion economic output in 2024 as well as supporting 589,354 jobs.
 - c. Shipping and commerce. Open sea lanes out of Southern California are essential to both national security and our nation's economy. More than 50% of all goods shipped from Asia to the U.S. transit through the Ports of Los Angeles and Long Beach alone, with most of those goods leaving California to supply the rest of the nation. California ports handle 38% of the national total of U.S. containerized imports into the U.S. and handle 28% of the national total of exports. Any disruption from oil and gas operations, including offshore oil spills—such as the 2021 anchor strike of an undersea pipeline that spilled 25,000 gallons of crude oil and impacted Orange County beaches—could

³ 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>

disrupt vessel traffic, delay cargo, and disrupt critical supply chains, hurting the U.S. economy. In the case of a catastrophic failure such as experienced previously in California as well as multiple other U.S. states, shipping, trade and commerce of the nation as a whole would likely face significant negative impacts.

- i. Telecommunications. Since the early 1990's, California has authorized the installation and operation of several fiber optic cable systems in state and federal waters in the OCS. These cables connect the United States to locations along the western rim of the Pacific Ocean to facilitate data networking and telecommunications, with a concentration of submarine and underwater fiber optic cable in Southern and Central California. Offshore oil and gas development could negatively impact this critical use of the OCS through ocean space use conflicts between the industries, as well as conflicts associated with additional boat traffic and should be thoroughly addressed in BOEM's analysis. BOEM should study the Submarine Cable Map and characterize any potential impacts from offshore drilling exploration to communication capacities. The [Submarine Cable Map](http://www.fiberatlantic.com) can be located at www.fiberatlantic.com.
 - ii. Defense Sector. As described below, the defense sector in California is considerable, collectively supporting 357,000 local jobs and \$61.3 billion in economic output. National security activity generates \$207 billion in total economic impact, almost 5% of California's economy, supports 818,000 full time jobs statewide and generates \$31.7 billion in federal, state and local tax revenue annually.
- d. Commercial and Recreational Fishing. Fisheries are also at risk from offshore oil and gas development and potential oil spills. California is home to dozens of commercial fisheries that hauled in roughly 178 million pounds of catch worth nearly \$200 million in 2024. The current national fisheries economics analysis reports that in 2023, California generated the largest seafood-related employment benefits in the Pacific region, supporting 160,939 full- and part-time jobs. The state also led the region in total economic contributions, including \$26.8 billion in sales, \$9.5 billion in value-added impacts, and \$5.7 billion in income (NMFS 2026).⁴ Many of the locations that currently support marine aquaculture facilities, 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.
- i. Water and sediment quality, and habitats can become degraded from oil exploration, construction, extraction, and maintenance. This degradation and other impacts could harm marine ecosystems and

⁴ National Marine Fisheries Service. 2026. Fisheries Economics of the United States, 2023. NOAA Tech. Memo. NMFS-F/SPO-254,30p. https://www.fisheries.noaa.gov/s3//2026-02/FEUS-2023-web_0.pdf

fisheries. Water quality can be impacted from improper handling of produced water, drilling waste, hydraulic fracturing fluids, accidental spills, leaky pipelines, and debris. All of this can cause detrimental impacts to water and sediment quality, and habitats that marine fish and invertebrates rely on, which can ultimately impact commercial and recreational fishing and aquaculture. The EIS should identify and analyze the impacts to commercial and recreational fishing and aquaculture from these impacts.

- ii. Potential reduced catch from high-energy seismic surveys can occur. High energy seismic surveys used in oil surveying can cause temporary and long-term impacts to marine fish ranging from fish leaving fishing grounds to barotrauma and death. The EIS should identify all potential impacts to marine fish species and to the associated fisheries.
 - iii. Reduced catch can also occur from exclusion of vessels and fishing gear types during Project exploration, construction, operation, and decommissioning. Vessels and gear types can be excluded from important fishing grounds from survey vessels preventing fishing vessels from transit through fishing grounds with gear in the water. Loss of important fishing grounds can also occur due to the platform structure and vessels unable to transit through with fishing gear in the water.
 - iv. Additional vessel traffic and structure in the water can also push fishermen farther offshore. This increases the safety risk and cost to fishermen transiting to new, farther fishing grounds. The EIS should analyze potential changes to the fleet from being pushed further offshore, both as an economic and a safety risk.
 - v. Additional infrastructure, including but not limited to pipelines, cables, and platforms, increases the risk of fishing gear entanglement. Entanglement may damage the fishing gear and be both a financial cost to the fishermen and potentially cause damage to the infrastructure. The EIS should analyze the risk of fishing gear entanglement and interaction with all associated infrastructure and activities during all phases of oil production.
- e. Public Access and Recreation. Tourism and recreation within California's coastal and offshore environments are essential to state and national economic interests. Tourism and recreation is the largest sector in California's marine economy, contributing 47% of the total GDP. Increased oil and gas development in California's OCS will increase risk of an oil spill from production and pipeline transport and could eliminate or reduce access to coastal waters for these activities. BOEM should analyze impacts to public access and recreation for visitors, businesses, and local and state governments including impacts related to:
- i. Temporary or permanent loss of public access or recreation opportunities. Impacts from continued oil and gas development activities in California's coastal and offshore environments would result

- in beach, water, and fisheries closures resulting in lost user days to the beach, boating, fishing, and other activities. BOEM should include an up-to-date assessment of the economic importance that these activities have to California and provide a detailed analysis of how the development of oil and gas offshore will impact this vital aspect of California's marine economy. BOEM should also include an assessment of the importance of public health in coastal access and recreation have to California.
- ii. Onshore and offshore traffic. Exploration, development, operation, and decommissioning of additional offshore oil and gas leases will contribute to offshore and onshore traffic impacts and congestion, worsening air quality and public health. BOEM should address this in the EIS.
 - iii. Noise. BOEM should include an assessment of noise impacts to coastal communities and recreationists due to oil and gas construction and other associated development and operation activities in the EIS.
 - iv. Visual Landscape/Aesthetics. BOEM should assess the impacts of offshore oil and gas development on the coastal visual landscape and aesthetics. This should include the added infrastructure of offshore oil and gas development, but also the onshore infrastructure that will be required for operations, transportation of crude oil and gas, and any refining or processing facilities required.
- f. Marine and coastal habitats and species. At a minimum, the EIS should include an analysis of impacts to marine habitats and species related to:
- i. Marine life, including federally and state listed species and other sensitive species: BOEM should identify all federally and state listed species and sensitive species that could be impacted by offshore oil and gas leasing activities, including exploration, development, operations and decommissioning.
 - ii. Loss and/or degradation of sensitive habitat (including, but not limited to intertidal or subtidal hard substrate, eelgrass beds, kelp forest, sand dollar beds, deepwater coral, Essential Fish Habitat, coastal wetlands and estuaries, beaches and dunes): Associated offshore oil and gas activities (exploration, development, operations, and decommissioning) will likely impact and potentially destroy critical marine and coastal habitats. BOEM should assess what these impacts are and the potential implications of damaging these habitats to coastal industries, such as fishing, aquaculture, recreation, and tourism.
 - iii. Modification of the sea floor from shells and other debris and the cleanup required upon decommissioning.
 - iv. National Marine Sanctuaries.
 - v. California's Marine Protected Area network.
 - vi. Ship strikes and other impacts associated with increased boat traffic
 - vii. Oil Spills, including:

1. Catastrophic spill (similar or larger than the 1969 Santa Barbara spill);
 2. Large spills (≥ 1000 barrels);
 3. Small spills (< 1000 barrels); and
 4. Cumulative impacts from multiple spills at a time (i.e., due to a major seismic event) and cumulative impacts to areas that have experienced previous spills
- viii. Noise (above and under the water surface).
 - ix. Lighting.
 - x. Vibration.
 - xi. Water and sediment quality (i.e., impacts from routine discharges of produced water, drilling muds, sanitary wastes and other platform wastewater, turbidity, ship waste, etc.).
 - xii. Air quality including greenhouse gas emissions.
 - xiii. Invasive species.
 - xiv. Erosion from terrestrial activities.

g. Hazards.

- i. Erosion.
- ii. Subsidence.
- iii. Induced seismicity.
- iv. Risk of blowouts or other unplanned occurrences.

h. Tribal Sovereignty and Cultural Resources. California Native American tribes have inhabited and stewarded California's coast and ocean since time immemorial. The State recognizes the inherent rights and responsibilities of California Native American tribes, their ongoing stewardship of the lands and waters now known as the United States, and their long-standing relationship with the federal government. We encourage BOEM to do the same and prioritize consultation with tribes during this process to avoid negative impacts, address tribal concerns, and respect tribal sovereignty.

- i. Tribal Sovereignty and Federal Trust Responsibility. BOEM should evaluate the project to determine its impact on tribal sovereignty and the federal government's trust responsibility. The EIS should analyze to what extent additional offshore oil and gas development could disproportionately impact tribal sovereignty and the federal government trust responsibility to tribes. This could include impacts to treaty rights, including rights regarding marine species fishing.
- ii. Tribal Cultural Resources. BOEM should conduct early, often, and meaningful consultations with tribes regarding impacts to tribal cultural resources, natural resources, and tribal communities.
 1. Consultations should be initiated early in the process to fully understand potential impacts, to reshape the project to avoid those impacts, and if avoidance isn't possible, mitigate impacts to minimize harm to tribal cultural and natural resources.

2. Tribes, as the original stewards of the land and water, have deep placed traditional ecological knowledge that is critical for the stewardship and care of the coast and ocean. Working closely with tribes will help BOEM fully understand the breath and complexity of the proposed project.
- i. Health and economic impacts on frontline communities. New offshore drilling would likely require onshore refinery and production facilities. BOEM should analyze how additional offshore oil and gas development and necessary onshore infrastructure could impact nearby communities, including through increased traffic, disruptive noise and shaking and toxic emissions from wells and storage tanks. BOEM should include in its EIS a list of associated health and safety impacts to nearby communities and to property values and other economic implications.
 - i. Health risks. The expansion of offshore oil exploration, development, transport and production poses serious health and safety risks to coastal communities through increased emissions, environmental contamination, and the potential for increased oil spills. Pollutants from offshore oil drilling operations can reach nearby coastal communities from increased vessel activity, impacting local air quality and water quality. Additionally, these activities increase the risk of oil spills that contaminate the environment and expose residents to toxins and carcinogens with associated health effects ranging from acute symptoms to chronic conditions like cancer, liver damage, immune dysfunction and neurological harm. New or increased oil and gas activity off the California coast will additionally result in increased use of existing pipelines, inland oil refinery activity, and other oil infrastructure that has potential to negatively impact the environmental quality and human health of adjacent communities. California's less affluent communities face unequal exposure and disproportionate impacts of increased oil activities given the increased proximity of these communities to oil and gas development infrastructure with refineries operating across the state. Vulnerable populations—including children, the elderly, tribal communities and communities of color—face heightened exposure to environmental contamination and greater barriers to recovery. Toxic groundwater and soil sites are disproportionately located in low-income and disadvantaged communities, many of which already face or will face increased exposure from sea level rise. New or expanded offshore oil and gas exploration in California risks increasing the number of toxic sites and compounding these burdens.

We appreciate the opportunity to provide these scoping comments on this NOI. We sincerely hope that BOEM removes California from the 2025-2029 Proposed Program. If

BOEM persists with scheduling leases for California's planning areas, it must fully and thoroughly analyze the impacts of doing so as required by National Environmental Policy Act.

We thank BOEM for the opportunity to submit these comments and reiterate the opposition of our Governor and the united voice of California's resource agencies and its state and local officials.

Sincerely,

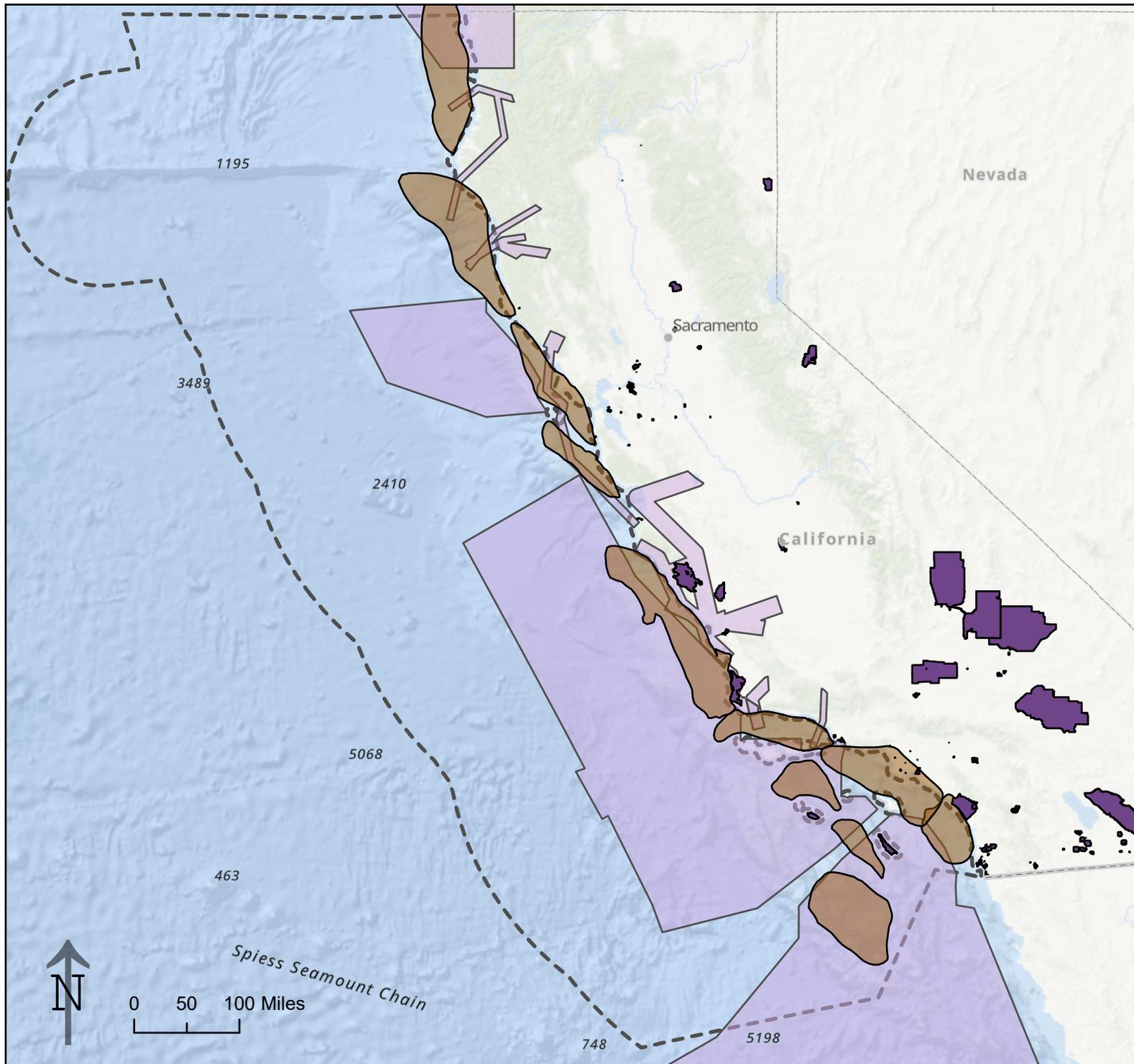


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California Offshore Drilling Impacts on Military Areas

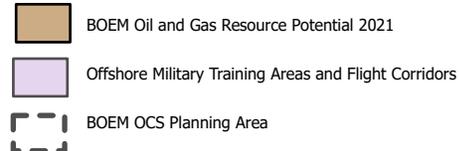
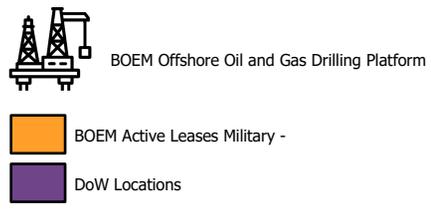
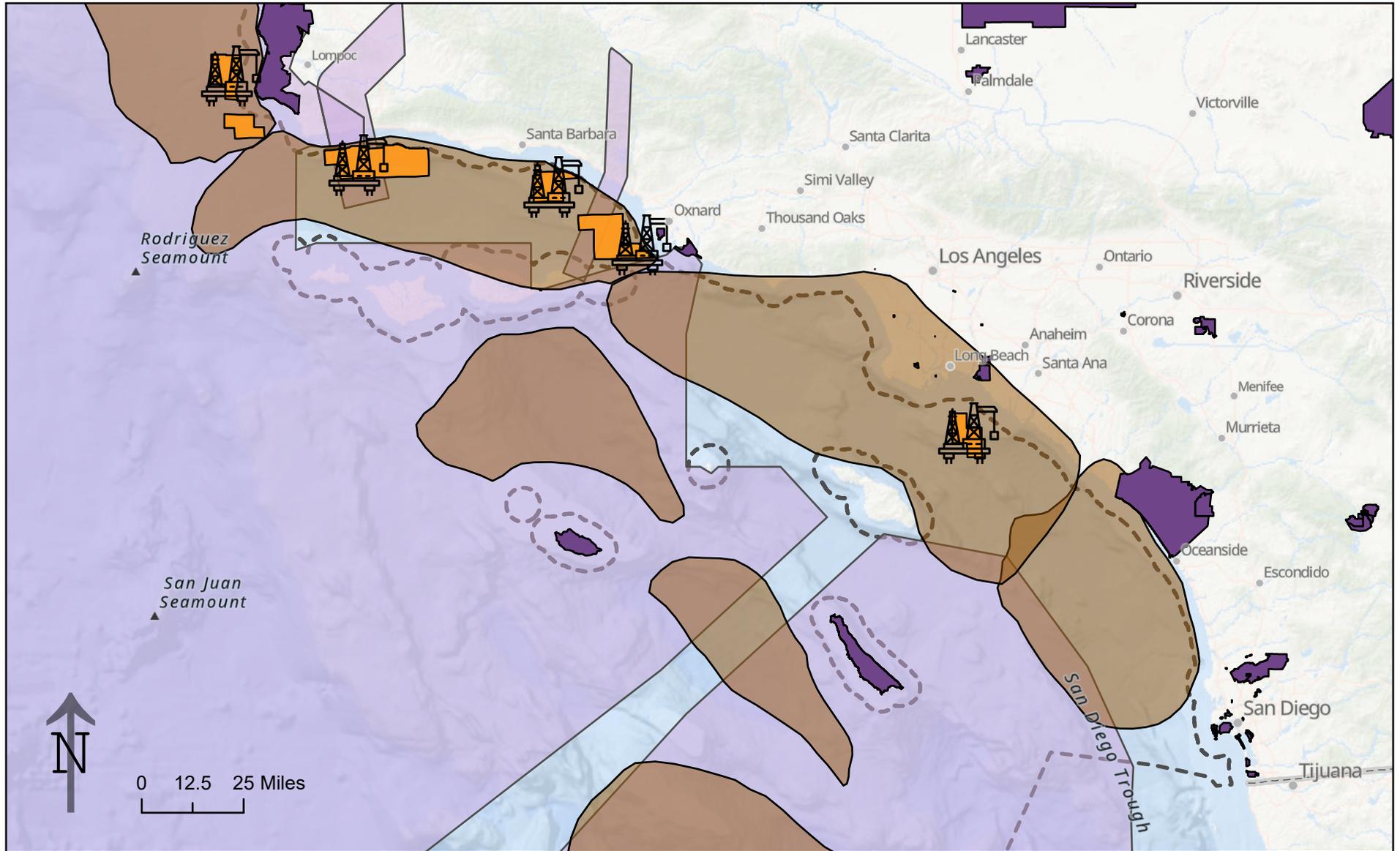


Legend

-  Military - DoW Locations
-  BOEM Oil and Gas Resource Potential 2021
-  Offshore Military Training Areas and Flight Corridors
-  BOEM OCS Planning Area

Layer Credits: NOAA, BOEM, Esri, California Department of Conservation

California Offshore Drilling Impacts to Military Areas - SoCal Coast



Layer Credits: NOAA, BOEM, Esri, California Department of Conservation