CALIFORNIA NATURAL RESOURCES AGENCY

GAVIN NEWSOM, *Governor*
WADE CROWFOOT, *Secretary for Natural Resources*

January 23, 2026

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,

I provide these comments on behalf of the California Natural Resources Agency in response to the Bureau of Ocean Energy Management's (BOEM) proposed 11th National Outer Continental Shelf Oil and Gas Leasing Program (OCS Program), a notice of which was published at 90 Federal Register 52996 on November 24, 2025, Docket No. BOEM-2025-0483.

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

As the federal government considers new or expanded oil and gas development offshore California, it must take into account California laws, goals and policies. (43 U.S.C. 1344(a)(2)(F).) I urge you not to pursue a course of action that California governors, legislators of both parties, and numerous state and local bodies consistently oppose.

The California Natural Resources Agency (CNRA) protects, manages and restores the state's environment and its natural, cultural and historic resources. **On behalf of our agency and its constituent departments, I underscore our request that BOEM remove the three Outer Continental Shelf (OCS) planning areas along California's coast from inclusion in the Pacific OCS Region in the 11th OCS Leasing Program.**

CNRA 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 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 objected to previous 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 policies protecting California's valuable ocean and coastal resources, including commercial and recreational uses.

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, community, and environmental risks these activities pose.[1] California has remained steadfast in its opposition to new offshore oil and gas development for decades based on data, information, and experience.

This is not a partisan or geographic issue. Over the last four decades, California leaders have expressed consistent, united opposition to any new offshore oil and gas activities. In 2006, 2008, 2014, and 2017, Republican and Democratic governors in California, Oregon, and Washington sent letters to the President of the United States and to Congress supporting moratoria on new offshore oil and gas leasing and opposing any efforts to renew and expand oil and gas leasing off the entire West Coast. The economic, environmental, and community risks of expanded offshore drilling are simply too great.

No new 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, including the 2015 Plains All American spill which released approximately 140,000 gallons of heavy crude oil from an onshore pipeline along the Gaviota coast in Santa Barbara County and the 2021Amplify offshore pipeline rupture and spill offshore of Huntington Beach that released over 25,000 gallons of crude oil, contaminating Huntington Beach and

[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.

Newport Beach shorelines in Orange County. These devastating most recent spills in southern California waters impacted areas of cultural significance for California Native American tribes and 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 spills along California's coast and resulting damage have fortified California's opposition to new offshore oil and gas development. 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.

California leaders 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. 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] Additional state legislation was passed in 2019 prohibiting the state from entering into any new lease or allow for new oil and gas infrastructure on public lands from oil and natural gas production on federal lands that are, or were at any time, designated as federally protected lands, and in 2024 authorizing cities and counties to use local ordinances to prohibit oil and gas development and operations in their jurisdictions.[4,5]

Given this consistent and codified opposition to new oil and gas development off the California coast, state agencies have the legal authority to block the construction or use of pipelines through state waters to transport oil onshore from new leases in federal waters.

I. Offshore Oil and Gas Development Poses Significant Economic Risks

Response and recovery from an oil spill results in significant financial costs for California. As an example, the overall costs from the Plains All American oil spill, including anticipated legal claims, were estimated at $275 million. The spill also resulted in a significant adverse economic impact 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.

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[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
[4] AB 342: Bill Text - AB-342 Public lands: leasing: oil and gas: prohibition
[5] AB 3233: Bill Text – AB-3233: Oil and gas: operations: restrictions: local authority

Furthermore, California's offshore waters host a breadth of different economic uses competing for space and resources that could be impacted by new oil drilling. Important activities occurring within the OCS include: ongoing military operations (including Navy and U.S. Coast Guard training and testing and U.S. Space Force rocket launch and landing activities); commercial and recreational fishing; aquaculture; tourism and recreation; marine trade and commerce (including two of the nation's largest import terminals in the Ports of Los Angeles and Long Beach) telecommunication (including seafloor fiber optic cables); and offshore renewable energy development. California is at risk of spatial conflicts and other adverse impacts from expanded OCS oil and gas exploration and development activities, with consequences for the state's coastal economy and public safety, as described in more detail below.

Military and commercial maritime operations. The potential for expanded oil leases off the California coast presents additional risk to both military and commercial maritime operations critical to U.S. national security and commerce. California is home to the largest concentration of military forces in the nation with more than 30 major installations and 200,000 active and reserve component personnel. The San Diego area houses the U.S. Navy's Third Fleet, including five 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.

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. Placing additional oil infrastructure and expanding support operations related to this infrastructure presents increased risk and complexity in this mission critical space above, below and on the ocean's surface. Placing additional potentially volatile HAZMAT infrastructure within this range space presents additional risk to the U.S. Military's mission and its personnel under normal operation conditions and the potential for significant risk during a spill or other emergency.

Open sea lanes out of Southern California are mission critical to both national security and our country's ability to rapidly project maritime assets into the Pacific Theater. These lanes are important commercially to commerce through the transportation of needed commodities from Asia. More than 50% of all goods shipped from Asia transit through the Port of Los Angeles or Port of Long Beach alone, with two-thirds of those goods leaving California to supply the rest of the nation. Not only would the building and implementation of additional HAZMAT infrastructure create the potential for significant logistical hurdles and risk under normal conditions, a major spill, fire or other emergency could pose numerous and serious consequences to both commerce and national security.

Commercial and recreational fishing. Fisheries are similarly at risk by offshore oil and gas development and potential oil spills. California is home to dozens of state and federally managed commercial fisheries that hauled in some 178 million pounds of catch worth

nearly $200 million in 2024, a significant contribution to national seafood production. Following the Plains All American 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. 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.

Tourism and recreation. 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).[6] 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. Putting these valuable resources at risk with additional offshore oil and gas development is not in the interest of Californians or visitors to California's coast.

Marine trade, commerce and telecommunications. Expanding offshore oil and gas production off the California coast could pose significant risks to marine transportation systems that underpin both regional and national commerce. According to the 2024 NOAA Marine Economy Report, marine transportation is the second largest of California's six ocean-dependent economic sectors, accounting for 39 percent of the ocean-dependent GDP in 2021 ($20 billion). 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.

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[6] 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

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.

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 various locations along the western rim of the Pacific Ocean to facilitate data networking and telecommunications. 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.

II. Offshore Oil and Gas Development Has Unacceptable Community Risks

California is home to 109 federally recognized California Native American tribes and approximately 60 non-federally recognized tribes, many of which have deep ancestral ties to California's coastline and ocean. Additionally, nearly 70% of all Californians currently live in coastal counties, and millions of the State's residents visit the coast each year. Expanded offshore oil and gas development, including the release of air pollutants associated with transport and refining that degrades local air quality, and increased threat of oil spills, puts California's coastal communities at risk, endangering public health and safety, tribal cultural resources and traditional practices, and coastal access – in direct conflict with the state's deeply held social values. Furthermore, continued reliance on fossil fuels to meet the country's energy needs contributes to the climate crisis, exacerbating impacts that threaten lives and livelihoods, critical infrastructure, public and private property and economic well-being.

California Native American tribes. California Native American tribes have inhabited and stewarded California's coast and ocean since time immemorial. Historical wrongs, including war, violence, attempted genocide, and the forced removal of Native peoples from their homelands, continue to impact tribal communities to this day. Historically, tribes in California have had limited ability to purchase and access land, minimal opportunity for economic development, and an increased risk of exposure to air and water pollution resulting from resource extraction. In 2019, Governor Gavin Newsom issued Executive Order N-15-19, which included a formal apology to tribes on behalf of the State of California for the "many instances of violence, maltreatment and neglect California inflicted on tribes."

However, despite historical wrongs, tribes have never ceded their inherent rights and responsibilities to steward the lands and waters of what is now known as California, and tribes maintain deep cultural connections to the coast and ocean. Many coastal tribes continue to rely on marine ecosystems for food, medicine, and cultural use, and are actively engaged in research, monitoring, and stewardship work to protect these ecosystems. Additionally, inland tribes often have direct ties to the coast through trade,

seasonal ceremonies, or kinship with coastal tribes. Finally, many California tribal citizens participate in ocean-based industries such as aquaculture or commercial fishing.

In consultations with State government, tribes have consistently expressed that tribal food security, economic prosperity, and cultural lifeways depend on a healthy coast and ocean. The environmental risks associated with offshore oil and gas development, including air pollution, seafloor disturbance, exposure to toxins and carcinogens, and increased risk of oil spills, have the potential to undermine this relationship and negatively impact tribes. Additionally, beyond the many direct risks to the marine environment, offshore oil and gas development has the potential to negatively impact tribal cultural resources. Such resources include not only archaeological and historical resources such as villages, places of ceremony, burial sites, and shell mounds, but also viewsheds, landscapes, species of cultural importance, and the interconnection of tribal communities with their environments.

The State recognizes the inherent rights and responsibilities of California Native American tribes, their historic and ongoing stewardship of the lands and waters now known as the United States, and their long-standing relationship with the federal government. I encourage BOEM to do the same and to prioritize early, often, intentional, and meaningful consultation with tribes during this process to avoid negative impacts, address tribal concerns, build tribal capacity, and respect and uphold tribal sovereignty.

Coastal communities. 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 underserved 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, including the San Francisco Bay Area, Los Angeles, and the Central Valley. 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; more than 5,200 such sites line the San Francisco Bay shoreline alone. Expanded oil and gas activity in California risks increasing the number of toxic sites and compounding these burdens.

Access to the California coast is a constitutional right protected by the California Constitution and the California Coastal Act. Access to clean beaches, tidepools and ocean waters provides opportunities for recreation, community connection, spiritual practice and mental and physical wellbeing, resulting in immeasurable social, cultural and health benefits for California residents and visitors. Increased oil activity and risk of oil spills have the potential to reduce or eliminate access to the coast, increasing stress and anxiety, disconnecting people from nature and adversely affecting community health.

Oil spills also threaten public health and food security for subsistence fishermen across the state. Tens of thousands of fishermen, many of which come from low-income, tribal communities and communities of color, rely on subsistence fishing from the shore and piers as a source of food. Oil spills contaminate seafood, increasing toxin consumption by subsistence fishers and exposure to associated harmful health impacts. Oil spills also result in fishery closures, reducing or eliminating access to an essential food source for people who rely on these fish to feed themselves and their families.

III. 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 sensitive habitats including kelp forests, eelgrass beds, submarine canyons, offshore islands, and coastal wetlands. These sensitive habitats are home to marine species considered threatened or endangered under both state and federal laws. One example is the Southern Sea Otter, a keystone species that is endemic and unique to California and critical to the health of the state's kelp forests. 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.

Environmentally sensitive areas. 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. This high diversity and abundance of marine species is a major driver of California's commercially and recreationally diverse and valuable fisheries.

In recognition of the importance of sustaining this critical ecosystem and the diverse and vulnerable communities and species it supports, the State and federal government have worked in tandem to protect California's marine environment through the designation of National Marine Sanctuaries and Marine Protected Areas. The offshore waters of California include five National Marine Sanctuaries, protecting nearly 17,000

square miles of ocean and seafloor habitats. The purpose of the Sanctuary system, according to the National Oceanic and Atmospheric Administration (NOAA), is to "protect America's most iconic natural and cultural marine resources."

California has expanded on our treasured National Marine Sanctuary system by establishing a network of Marine Protected Areas (MPAs), as required under the California Marine Life Protection Act, by using sound science and community input to establish a statewide network of marine protected areas to protect the diversity and abundance of marine life, the habitats they depend on, and the integrity of marine ecosystems. California's 124 MPAs cover 16% of state waters across along our entire 1,100-mile coastline and were recently included on the International Union for the Conservation of Nature Green List of Protected and Conserved Areas and recognized as the international gold standard for science-based marine conservation – the first nature network in the world to receive this status.[7]

The goals and objectives of the MPA program align with requirements of the California Coastal Act to maintain, enhance and restore the biological productivity of coastal waters and marine organisms, and on a global scale, natural conservation networks like California's MPAs and marine sanctuaries are essential to sustaining and restoring ocean ecosystems. Thus, the State of California has worked to steward and protect these valuable coastal areas. Exposing them to degradation and damage from new oil and gas development and the accompanying likelihood of significant oil spills is incompatible with long-standing State policy, and the ecological importance of these areas must be factored into BOEM's analysis of the sensitivity and environmental value of OCS resources.

Furthermore, due to the uncertain nature of California's offshore oil reserves, any new development is likely to necessitate high energy seismic surveys to conclusively map the ocean floor and better define the location of oil and gas reserves. The powerful acoustic pulses used during such surveys are among the very loudest anthropogenic underwater sound sources and has been shown to cause the disturbance, injury, and even death of marine species, including large whales. Underwater noise from high energy seismic surveys would also adversely affect habitat conditions in marine protected areas and may reduce commercial and recreational fishing by precluding fishing and potentially affecting fish behavior and biology.

In addition to the risk of a catastrophic oil spill, adverse impacts from day-to-day oil and gas operations pose a significant environmental risk to coastal resources. Construction and operation of oil and gas platforms are likely to result in adverse impacts to sensitive marine habitats and species, water quality, commercial and recreational fishing, visual resources, tribal and cultural resources, and public access and enjoyment of California's coastal zone, all resources protected under the California Coastal Act.

California's valuable marine ecosystems and our network of state and federally protected marine areas would be at risk from expanded OCS oil and gas exploration and development. The economic and environmental value protecting California's

[7] California Marine Protected Area Network

coastal resources outweighs any potential benefits California may receive from additional oil and gas development. The risks of such development would jeopardize the unique and irreplaceable California coast.

Water quality. The increased likelihood and magnitude of oil spills, 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 degrade water quality, with impacts on marine life and habitats. As described above, California has experienced five significant oil spills in recent years that resulted in devastating environmental and economic consequences. For example, in 2015 the Plains All American Pipeline, which transported oil from offshore platforms in the Santa Barbara Channel, ruptured near Refugio State Beach, spilling approximately 140,000 gallons of crude oil into a ravine, much of which reached the ocean and spread into the marine environment, contaminating coastal and ocean water quality, harming wildlife, and triggering a six-week closure of commercial and recreational fishing across a 138-square-mile area.

In addition to California's network of marine protected areas, the state's coastal waters include 34 State Water Quality Protection Areas, designated as Areas of Special Biological Significance (ASBS), to protect sensitive areas from pollution and preserve natural water quality in places with exceptional marine life and biodiversity. ASBS cover much of the length of California's coastline and protect water quality in critical habitats for hundreds of unique and fragile species. New or expanded offshore oil and gas exploration, operations, and transport, with the risk of increased spills, poses threats to water quality and ecosystem health within these areas and has the significant potential to degrade natural water quality in violation of state requirements designed to protect these sensitive areas.[8]

Specific impacts to water quality, as described above, must be addressed in BOEM's analysis, and activities that could impact sensitive ecosystems and environmentally sensitive areas, including marine protected areas and ASBS must be excluded.

Earthquakes and induced seismicity.
California's offshore waters have a wide variety of geologic hazards that warrant careful characterization and analysis prior to placement of offshore oil and gas facilities. California is one of the most seismically active regions in the United States, and strong to violent earthquakes are likely to impact the offshore region. 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), there have been six earthquakes of magnitude 7 or larger in the last 45 years. In addition, the Cascadia Subduction Zone is capable of seismic events up to magnitude 9 that can lead to the most extreme and damaging

[8] State Water Resources Control Board. California Ocean Plan. 2019. See also, Map of Areas of Special Biological Significance. State Water Resources Control Board.

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

Seismic shaking from these events 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. 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.

Offshore drilling activities could exacerbate California's high likelihood of earthquakes and tremors, by triggering man-made earthquakes. This phenomenon is known as "induced seismicity" and is more likely in areas with existing faults. Disposal of fluids from oil and gas production, geothermal energy production, mining, construction, disposal of waste fluids, and impoundment of large reservoirs can cause induced seismicity. All of these hazards may impact offshore oil and gas facilities, including pipelines and drilling platforms, increasing the risk of an oil spill.

As stated in the letters provided to BOEM in response to the 2018 Draft Proposed Program and our June 2025 response to BOEM's Request for Information[9], the State of California is committed to protecting the state's coastal resources. Given the significant economic, public health and safety, cultural and environmental risks associated with new 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

[9] 2025 Comment Letter on BOEM RFI from Governor Newsom and California Natural Resources Agency