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June 16, 2025

Ms. Kelly Hammerle, Program Manager
Bureau of Ocean Energy Management (VAM-LD)
Sterling, VA 20166-9216

Re: Request for Information and Comments on the Preparation of the 11th National Outer Continental Shelf Oil and Gas Leasing Program (Docket no. BOEM-2025-0015)

Dear Ms. Hammerle,

As 107 legislators representing 19 coastal states and territories, we wish to submit a joint response to the Bureau of Ocean Energy Management's ("BOEM") [Request for Information and Comments on the preparation of the 11th National Outer Continental Shelf \(OCS\) Oil and Gas Leasing Proposed Program](#) ("11th National OCS Program"). The Outer Continental Shelf Lands Act ("OCSLA") recognizes the importance of state stakeholder input when developing the new five-year schedule of proposed oil and gas leases, particularly as they pertain to the environmental risk and potential damage to coastal and marine resources associated with OCS development.¹ It is our shared belief that including any proposal to expand oil and gas leases under the 11th National OCS Program would have a detrimental impact on our constituents, regional economies, and the natural environment on which our states rely.

Impact of Offshore Drilling on States

April 2025 marked the 15-year anniversary of the largest offshore oil spill in America, Deepwater Horizon, where almost 134 million gallons of crude oil were released into the Gulf over the course of 87 days.² Total economic impacts for 2010-2020 of foregone commercial fishing revenue and recreational fishing expenditures of the spill indicated a loss of 25,000 jobs, \$2.3 billion in industry output, \$700 million in labor income, and \$160 million in state and local tax revenues.³ According to [TripAdvisor](#), consumers searched 52% less often for Pensacola (FL), 65% for Gulf Shores (AL), and 48% for Destin (FL) in the month following the Deepwater

¹ 43 U.S.C. § 1346(a)(1)

² NOAA National Ocean Service. (2017, April 20). *Deepwater Horizon: Effect on Marine Mammals and Sea Turtles*. NOAA. Available at <https://oceanservice.noaa.gov/news/apr17/dwh-protected-species.html>

³ Murawski, S., et al. (Eds.). (2020). *Effects of the Deepwater Horizon oil spill on human communities: Catch and economic impacts*. In *Deep oil spills* (pp. 569–580).

Horizon spill.⁴ The value of real estate sales along the Gulf Coast of Alabama saw a 50% decline in the months following the spill.⁵

In 2004, Hurricane Ivan caused the [Taylor Energy](#) oil production platform off the coast of Louisiana to collapse. As of May 2025, oil from the well continues to discharge into the open ocean, harming critical marine species and ecosystems. Containment efforts are still ongoing, making the Taylor spill the longest-running oil spill in the nation's history.⁶ Many of us also remember the Exxon Valdez oil spill in Alaska's Prince William Sound, where 11 million gallons spilled and polluted 1,000 miles of coastline. This spill decimated the environment, killing thousands of salmon, otters, and eagles, as well as a quarter of a million seabirds. And this August marks the 20-year anniversary of Hurricane Katrina, where over almost [70](#) offshore oil and gas platforms were damaged or destroyed in the storm, and over 7 million gallons of oil leaked into the ground and coastal waterways as a result.⁷

These examples serve to show that accidents can happen with offshore drilling, and no amount of planning or resources can fully mitigate the harm done to coastal fisheries, habitats, tourism, and the economy in the event of an accidental oil spill. The perceived industrial and workforce development benefits associated with offshore oil and gas production pale in comparison to the detrimental human, economic, and marine impacts our states face following oil spills.

Recommendations for the 11th National OCS Program

Issue no new leases in the 11th Annual OCS Program

As of April 2025, BOEM [administers](#) 2,227 active oil and gas leases across 12.1 million acres under OCS jurisdiction, with 469 of these leases producing oil and gas.⁸ Only a fifth of the 2,206 active leases in the Gulf of America Planning Area are active, and only a seventh are active in the Alaska Planning Area.⁹ The 10th National OCS Program for 2024-2029 already includes an additional three lease sales in the Gulf of America Planning Area.¹⁰ The [CEO of ExxonMobil, Darren Woods](#), indicated at the most recent United Nations Climate Change Conference of the

⁴ Oceana. (2019). *Oil spills and tourism don't mix*. Coastal Carolina River Watch. Available at <https://coastalcarolinariverwatch.org/wp-content/uploads/2019/06/14Oil-Spills-Tourism-Dont-Mix-Oceana.pdf>

⁵ Winkler, D., & Gordon, B. (2013). The effect of the BP oil spill on volume and selling prices of oceanfront condominiums. *Land Economics*, 89(4), 614–631. <https://doi.org/10.3368/le.89.4.614>

⁶ Damage Assessment, Remediation, and Restoration Program. (2025, February 26). *Taylor Energy* [Oil spill profile]. National Oceanic and Atmospheric Administration. Available at <https://darrp.noaa.gov/oil-spills/taylor-energy>

⁷ Bureau of Safety and Environmental Enforcement. (2005, January 19). *Hurricane Ivan – Lessons learned*. U.S. Department of the Interior. Available at <https://www.bsee.gov/sites/bsee.gov/files/news/hurricanes/press0119.pdf>

⁸ Federal Register. (2025, April 30). *Outer Continental Shelf (OCS), Gulf of Mexico, oil and gas lease sales*. 89 Fed. Reg. 33847.

⁹ Bureau of Ocean Energy Management. (2025). *Lease sale statistics as of January 1, 2025*. U.S. Department of the Interior. Available at <https://www.boem.gov/sites/default/files/documents/oil-gas-energy/leasing/Lease%20stats%201-1-25.pdf>

¹⁰ Bureau of Ocean Energy Management. (n.d.). *2024–2029 National OCS oil and gas leasing program: Gulf of America area identification*. U.S. Department of the Interior. Available at <https://www.boem.gov/oil-gas-energy/national-program/2024-2029-go-a-area-identification>

Parties that he does not believe oil production in America is currently constrained, primarily because “most operators in the US are [already] optimizing their production today”.¹¹ It is our belief that the current offshore oil and gas leases and infrastructure meet national energy needs within the National OCS program, and therefore, no new leases should be issued.

To date, the Atlantic OCS Region has no active oil and gas leases, and the last lease sale was held in 1983. No lease sales in the four planning areas in the Pacific Region have been included in the National OCS Program since the 1987-1992 plan, in part due to consistent opposition by the States of Washington, Oregon, and California to any activity off the coasts.¹² Declining industry interest in increased production, compounded with the number of idle and unused leases, raises serious questions for us as policymakers about the need or demand for new lease sales. We therefore respectfully request that no new lease sales in the 27 OCS Planning Areas are included in the 11th National OCS Program.

Maintain protections for current restricted areas

Under [section 12\(a\)](#) of the OCSLA, the President of the United States may withdraw any unleased lands of the OCS from lease consideration.¹³ To date, Presidential withdrawals include the North Aleutian Basin Planning Area (Alaska), South Atlantic and Straits of Florida Planning Area, North Carolina portion of Mid-Atlantic Planning Area, and portions of the Central and Eastern Gulf of America Planning Areas.¹⁴ On January 6, 2025, a Presidential Memorandum [directed the withdrawal](#) of areas in the Atlantic Coast, Eastern Gulf of Mexico, Pacific Outer Continental Shelf, and Alaska’s Northern Bering Sea from future oil and gas development.¹⁵ These Planning Areas border our state waters, which are home to key economic activities like coastal tourism and recreation, commercial fishing, and ship and boat building. For example, the Bering Sea and Aleutian Islands Area supports some of the largest and [most valuable](#) commercial fisheries in the United States¹⁶, and the Port of New Bedford lands [over \\$443 million](#)

¹¹ Franco, J. (2024, November 12). Exxon CEO: Donald Trump shouldn’t scrap methane regulations. *Semafor*. Available at <https://www.semafor.com/article/11/12/2024/exxon-ceo-darren-woods-donald-trump-shouldnt-scrap-methane-regulations>

¹² Bureau of Ocean Energy Management. (2025). *Areas under restriction* [Docket No. BOEM–2025–0015]. U.S. Department of the Interior.

¹³ 43 U.S.C. § 1341(a)

¹⁴ Bureau of Ocean Energy Management. (2025). *Areas under restriction* [Docket No. BOEM–2025–0015]. U.S. Department of the Interior.

¹⁵ The White House. (2025, January 6). *Fact sheet: President Biden protects Atlantic and Pacific coasts from offshore oil and gas drilling*. Available at <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2025/01/06/fact-sheet-president-biden-protects-atlantic-and-pacific-coasts-from-offshore-oil-and-gas-drilling/>

¹⁶ Alaska Department of Fish and Game. *Bering Sea/Aleutian Islands Area commercial fisheries*. Available at <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareaaleutianislands.main>

worth of seafood annually. Any new lease sales pose a significant threat to the coastal economies on which our entire country relies.¹⁷

In accordance with section 12(a) of the OCSLA, any National Marine Sanctuary designated as of July 14, 2008 is also withdrawn from oil and gas leasing for a time without specific expiration. As of May 2025, 14 National Marine Sanctuaries are located on the OCS. [Additional restrictions](#) exist for certain National Wildlife Refuges, Wilderness Buffer Zones, National Parks, and Marine National Monuments.¹⁸ These protected areas serve as critical habitats for native species, conserve fish and wildlife populations, and generate billions of dollars in regional economic output and job creation. Given the beneficial marine, economic, and human impacts of these protected areas, we request that the Administration not consider any areas currently unavailable to leasing in the 11th Annual OCS Program.

We appreciate the opportunity to provide input on the formulation of the 11th National OCS Program. It is our belief that the inclusion of new oil and gas lease sales is unnecessary to meet current or future national energy needs, especially when considering the number of inactive leases in the 27 OCS Planning Areas. The human, economic, and marine risks that spills and increased offshore oil and gas exploration pose can have detrimental impacts on our coastal habitats and industries, on which the whole nation relies. Considering these threats, we respectfully urge you to consider the aforementioned concerns expressed by state policymakers when developing the 11th National OCS Program.

Thank you for your time.

Signed,

Maryland Delegate David Fraser-Hidalgo
(MD-15)

Massachusetts Senator Julian Cyr
(MA-Cape and Islands)

New York Assemblymember Emily Gallagher
(NY-50)

North Carolina Representative Pricey Harrison
(NC-61)

Connecticut Representative Lucy Dathan
(CT-142)

Connecticut Representative Susan Johnson
(CT-49)

Delaware Senator Stephanie Hansen
(DE-10)

Delaware Representative Frank Burns
(DE-21)

¹⁷ Port of New Bedford. *#1 commercial fishing port for 18 consecutive years*. Available at <https://portofnewbedford.org/commercial-fishing/#:~:text=%231%20Commercial%20Fishing%20Port%20for%2018%20Consecutive%20Years>

¹⁸ Bureau of Ocean Energy Management. (2025). *Areas under restriction* [Docket No. BOEM–2025–0015]. U.S. Department of the Interior.

Florida Representative Anna Eskamani
(FL-42)

Georgia Representative Eric Bell
(GA-75)

Georgia Representative Spencer Frye
(GA-122)

Georgia Representative Marvin Lim
(GA-98)

Georgia Representative Kim Schofield
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(ME-100)

Maine Representative Art Bell
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Maine Representative Laurie Osher
(ME-25)

Maine Representative Daniel Sayre
(ME-125)

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Maryland Delegate Julie Palakovich Carr
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Massachusetts Senator James Eldridge
(MA-Middlesex and Worcester)

Massachusetts Senator Adam Gómez
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(GA-42)

Georgia Representative Mary Frances Williams
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Massachusetts Representative Lindsay Sabadosa
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(NH-04)

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New York Assemblymember Sarahana Shrestha
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Virginia Delegate Paul Krizek
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North Carolina Representative Sarah Crawford
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North Carolina Representative Nasif Majeed
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North Carolina Representative Renee Price
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North Carolina Representative Julie von Haefen
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Oregon Representative Mark Gamba
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Oregon Representative Zach Hudson
(OR-49)

Puerto Rico Senator Ada Alvarez Conde
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Rhode Island Representative Edith Ajello
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Rhode Island Representative Jennifer Boylan
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Rhode Island Representative Terri-Denise Cortvriend
(RI-72)

Texas Representative Penny Morales-Shaw
(TX-148)

Virginia Senator Ghazala Hashmi
(VA-15)

Virginia Senator Saddam Salim
(VA-37)

Virginia Delegate Betsy Carr
(VA-78)

Washington Representative Alex Ramel
(WA-40)

