

Ms. Kelly Hammerle  
Bureau of Ocean Energy Management (VAM-LD)  
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Re: Comments for the Bureau of Ocean Energy Management Request for Information (RFI) on the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program  
Docket No. BOEM–2024–0022

The Santa Cruz County Board of Supervisors strongly opposes the inclusion of Pacific Coast planning areas in the Bureau of Ocean Energy Management's (BOEM) Request for Information (RFI) for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program. This RFI, initiated under Executive Order 14154, "Unleashing American Energy," proposes expanded fossil fuel development on federal lands and waters, including areas currently protected by law—such as the Monterey Bay National Marine Sanctuary (MBNMS).

Although the RFI does not name specific lease areas, it invites comment on all 27 OCS planning regions, including those withdrawn from leasing through presidential or congressional action. This signals a troubling departure from longstanding bipartisan commitments to protect fragile marine ecosystems and undermines the legal framework established by the Energy Policy Act of 2005 and the Outer Continental Shelf Lands Act.

#### The Monterey Bay National Marine Sanctuary Must Remain Off-Limits

Designated in 1992 to prevent offshore oil development, the MBNMS spans more than 6,000 square miles and includes some of the most ecologically diverse marine environments in the United States. It encompasses the Monterey Submarine Canyon, Davidson Seamount, extensive kelp forests, and critical habitats for marine mammals and endangered species. The sanctuary supports a \$4.4 billion tourism and fishing economy across Monterey and Santa Cruz Counties and is a vital hub for scientific research, education, and conservation.

To consider opening this sanctuary—or others like it—to oil and gas leasing is not only unlawful but an affront to the communities that have worked tirelessly to preserve these resources for future generations.

#### Drilling in Marine Sanctuaries Is Prohibited by Federal Law

Federal law explicitly prohibits new offshore oil and gas leasing in national marine sanctuaries. Section 388 of the Energy Policy Act of 2005 and sanctuary regulations (15 C.F.R. § 922.132 and § 922.232) bar such activities. Any leasing proposal that includes sanctuaries like Monterey Bay, Channel Islands, or Chumash Heritage would violate these clear legal protections.

#### Offshore Drilling Undermines Climate and Environmental Goals

Expanding offshore fossil fuel development directly contradicts national and global climate goals. Oceana estimates that permanently protecting unleased federal waters could prevent more than 19 billion tons of greenhouse gas emissions—equivalent to taking every U.S. car off

the road for 15 years. This proposal moves in the wrong direction at a time when we must urgently accelerate the transition to renewable energy.

#### Oil Spills Pose Ongoing and Unacceptable Risks

Offshore drilling carries inherent risks of spills and pollution. The Deepwater Horizon disaster released more than 200 million gallons of oil into the Gulf of Mexico, causing extensive ecological and economic harm. California's Central Coast is home to vulnerable ecosystems and coastal economies that cannot afford such devastation.

#### Unprotected Coastal Areas Also Need Safeguards

The region between the Monterey Bay and Chumash Heritage sanctuaries—including Morro Bay, Cayucos, and Montana de Oro State Park—remains unprotected yet ecologically and culturally vital. These areas contain sensitive marine habitats and sacred sites such as Morro Rock, revered by the Chumash and Salinan peoples. These landscapes deserve permanent protection.

#### Public Opposition Is Deep, Widespread, and Longstanding

Communities along the Pacific Coast have consistently opposed offshore oil drilling for over 50 years. Major oil spills—including the 1969 Santa Barbara disaster and the 2015 Refugio pipeline rupture—have fueled strong public resistance, reflected in numerous local, state, and federal actions. In Santa Cruz County, a grassroots campaign in the 1970s helped secure a national moratorium on offshore drilling, and a 1985 county ordinance—requiring voter approval for onshore support facilities—passed with 82% public support.

Today, this opposition remains unwavering. When the Trump Administration proposed expanded drilling in 2018, it was met with broad and immediate backlash, leading to the plan's withdrawal. In 2025, a coalition of 15 Democratic state attorneys general, including California's, filed suit to stop fossil fuel projects that bypass environmental review.

More than 65 cities and counties in California, representing over 21 million residents, have formally opposed new offshore oil leases. In 2014 and 2017, West Coast governors jointly affirmed their opposition. A 2022 survey by the National Marine Sanctuary Foundation found that 80% of Americans support protecting marine areas for their environmental, educational, and cultural value.

#### Conclusion and Request

From decades of community organizing to recent legal challenges, the message is clear: offshore oil drilling has no place off the Pacific Coast. BOEM must remove all Pacific planning areas from consideration in the 2024–2029 Five-Year Program and reaffirm that national marine sanctuaries are permanently off-limits to oil and gas development.

Our ocean is central to our economy, identity, and climate resilience. We urge BOEM to reject any new offshore oil and gas leasing—particularly in or near national marine sanctuaries—and

to uphold the protections that Californians and coastal communities across the country have long fought to defend.

Respectfully submitted,

Chair Felipe Hernandez

On behalf of the Santa Cruz County Board of Supervisors