Pacific Fishery Management Council

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Pete Hassemer, Chair | Merrick J. Burden, Executive Director

February 26, 2026

Necy Sumait, West Coast Supervisor
Bureau of Ocean Energy Management, Pacific Region
Office of Strategic Resources
760 Paseo Camarillo (CM 102)
Camarillo, California 93010

Re: **Call for Information and Nominations for Central and Southern California Outer Continental Shelf Oil and Gas Lease Sales Proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program; Federal Register Dockets BOEM-2026-01568 and BOEM-2026-01571**

Dear Ms. Sumait,

The Pacific Fishery Management Council (Council) appreciates the opportunity to provide comments on the Bureau of Ocean Energy Management's (BOEM) Call for Information and Nominations for Southern California Outer Continental Shelf Oil and Gas Lease Sales. The Council manages West Coast commercial and recreational fishing for many key California Current species. This includes ensuring the conservation and enhancement of habitats that support sustainable fisheries and taking into account the importance of fishery resources to fishing communities and the protection of marine ecosystems. In this letter, we reiterate serious concerns about Oil and Gas (O&G) leasing off the U.S. West Coast and the irreversible impacts to the California Current Ecosystem (CCE), important marine habitats, and fishing-dependent communities in this region.

The Council strongly objects to O&G leasing on the Pacific Coast, including within the Southern and Central California Call Areas. Leasing and future development in the Pacific Region expose ecological resources and fishing communities to a risk of significant damage. Adverse effects on fishing communities are likely to be irreversible and long-lasting. The Governors and state agencies from all three west coast states opposed inclusion in the National Oil and Gas Leasing Program when commenting on the 2025 BOEM Request For Information[1] and in previous proposals to open waters off the West Coast to O&G development.

[1]WA: BOEM-2025-0015-003_Washington_State_Comments
OR: BOEM-2025-0015-0003_GTK_ltr_Agency_Comments
CA: BOEM OCS Comment Letter_California_Governor Newsom_2025-0015

Council Authorities and Responsibilities

The Council is one of eight fishery management councils established by the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The MSA requires fishery management councils to describe, identify, conserve and enhance essential fish habitat (EFH) for species managed under their Federal fishery management plans (FMPs), in U.S. Federal waters (3-200 nm offshore). The MSA provides 10 National Standards for fishery conservation and management, including requirements to prevent overfishing, use the best available science in decision-making, provide for the sustained participation of fishing communities in fisheries, and promote the safety of life at sea. As such, the wellbeing of coastal communities is of great importance to the Council, and we are required to account for impacts to coastal communities related to fishery management decisions. The Council has responsibility to manage marine commercial and recreational fisheries in a manner that:

- Ensures a sustainable and safe domestic seafood supply and cultural benefits from fisheries, by achieving and maintaining, on a continuing basis, the optimum yield from each fishery;
- Protects ecosystem health and sustainability, including protection of EFH and ecosystem services; and
- Minimizes long-term economic and social effects to fisheries and fishing-dependent communities, in part by improving the ability to adapt to environmental variability and competing ocean uses.

The MSA's EFH regulations state that Councils "should identify specific types or areas of habitat within EFH as habitat areas of particular concern (HAPC) based on one or more of the following considerations:" (50 CFR § 600.815).

(i) The importance of the ecological function provided by the habitat.

(ii) The extent to which the habitat is sensitive to human-induced environmental degradation.

(iii) Whether, and to what extent, development activities are, or will be, stressing the habitat type.

(iv) The rarity of the habitat type.

Activities that could affect HAPCs typically receive greater scrutiny during EFH consultations. The Council's HAPC designations for Pacific Coast Groundfish include rocky reefs, canopy kelp, seagrass, estuaries, and areas of interest such as seamounts, canyons, and other areas containing important marine habitats.

Impacts to commercial and recreational fishing, and coastal communities

This section addresses potential use conflicts in the Central California and Southern California Call Areas (topic (d) in the BOEM Federal Register Notices).

Commercial and recreational fisheries operating within the Southern and Central California Call Areas are economically, socially, and culturally important. For 2024, the California Department of Fish and Wildlife (CDFW) reported the following pounds landed and ex-vessel revenues generated by commercial fisheries as well as numbers of fish caught and anglers fishing on

California based Commercial Passenger Fishing Vessels (CPFVs) for port complexes within the Southern[2] and Central[3] California Call Areas in 2024 (Table 1 and Table 2 below).[4]

Table 1. Fishery landings and revenues in Southern California ports.

	Commercial Fisheries		CPFV (recreational landings)†	
Port Complex	Pounds landed	Ex-Vessel Revenues*	# Fish Caught	# Anglers
Morro Bay	1,608,502	$3,677,860	130,990	19,725
Santa Barbara	81,522,392	$65,003,409	337,057	36,150
Los Angeles	50,568,973	$37,460,347	762,038*	100,859
San Diego	4,556,272	$12,110,212	488,654	186,798
Totals	**138,256,139**	**$118,251,828**	**1,718,739**	**343,532**

†Does not include private recreational fishing trips.
*Ex-vessel revenues reflect the dollars paid to fishermen. It does not account for any downstream economic benefits or multipliers.

Table 2. Fishery landings and revenues in Central California ports.

	Commercial Fisheries		CPFV (recreational landings)†	
Port Complex	Pounds landed	Ex-Vessel Revenues*	# Fish Caught	# Anglers
Monterey	16,123,297	$7,930,488	127,473	13,954
San Francisco	7,726,235	$26,529,558	213,905	40,907
Bodega Bay	3,276,381	$10,939,611	64,452	5,749
Totals	**27,125,913**	**$45,399,657**	**405,830**	**60,610**

*Ex-vessel revenues reflect the dollars paid to fishermen. It does not account for any downstream economic benefits.

[2] The **Morro Bay Port Complex** includes Port San Luis/Avila and Morro Bay. The **Santa Barbara Port Complex** includes Gaviota Beach, Guadalupe Beach, Oxnard, Port Hueneme, Santa Barbara Harbor, and Ventura. The **Los Angeles Port Complex** includes Avalon, Balboa, Catalina Island, Dana Point, Hermosa Beach, Huntington Beach, Long Beach, Marina Del Rey, Newport Beach, Redondo Beach, San Pedro, Seal Beach, Terminal Island, and Wilmington. The **San Diego Port Complex** includes Imperial Beach, La Jolla, Mission Bay, National City, Oceanside, Point Loma, and San Diego.

[3] The **Monterey Port Complex** is comprised of Monterey, Moss Landing and Santa Cruz. The **San Francisco Port Complex** is comprised of Alameda, Alviso, Benicia, Berkeley, China Camp Emeryville, Foster City, Martinez, Oakland, Pacifica, Petaluma, Pinole, Princeton-Half Moon, Redwood City, Richmond, Rodeo, San Francisco, San Leandro, San Rafael, Sausalito, South San Francisco, and Vallejo. The **Bodega Bay Port Complex** is comprised of Bodega Bay, Bolinas, Inverness, Marshall, and Tomales Bay.

[4] Source: California Department of Fish and Wildlife Marine Fisheries Data Explorer, accessed February 2026.

When considering the above it is important to note the commercial and recreational fisheries for salmon were closed off California in 2024. This likely understates the numbers we would expect in years without such a closure as the salmon fishery is vitally important to areas within the Central and Southern California Call Areas.

Recreational fishing in California is not only culturally important but provides a highly significant economic driver for the state. According to NOAA's Fisheries Economics of the United States 2022 report[5], recreational fishing in California "contributes the largest employment impacts in the Pacific Region with 187,519 full- and part-time jobs. California also generated the largest sales impacts ($31.2 billion), value-added impacts ($11.1 billion), and income impacts ($6.6 billion)." Potential sources of recreational fisheries data would also include the California Recreational Fisheries Survey and Recreational Fisheries Information Network. The Council recommends BOEM obtain and evaluate all information related to commercial and recreational fishery effort, catch and economic impacts before finalizing any areas for leasing.

Both commercial and recreational fisheries operating within the Central and Southern California Call Areas generate significant revenues in terms of license sales, taxes and fees. They also support a number of dependent businesses including processors, live bait providers, tackle and gear manufacturers and distributors. The presence of O&G facilities could impact commercial and recreational fishing activities by creating navigation hazards and preventing access to important fishing areas. The potential for a major oil spill is a very real possibility and could have devastating consequences for the region, including severe impacts to the ecosystem, commercial and recreational fishing, and the associated economic and community benefits.

The Council recently submitted a comment letter[6] to NOAA Fisheries outlining potential conflicts with important commercial and recreational fishing grounds within areas that had been identified as Aquaculture Opportunity Areas off the Ventura/Santa Barbara coast. **Before BOEM finalizes and areas for leasing, the Council strongly recommends a spatial suitability analysis be undertaken to ensure important fishing grounds within the Southern California Call Area are not considered for leasing.**

BOEM should also enlist the assistance of the fishing community and CDFW in identifying important fishing grounds. Fishery data reported to CDFW on logbooks is not discrete enough for spatial planning purposes. A fisherman reports his/her catch location utilizing Fishing Blocks established by CDFW. In some instances, these Blocks are 100 square nautical miles. There are other sources of information BOEM should utilize. For example, fishermen in Morro Bay recently undertook efforts to map important fishing grounds. The Central Coast Fishing Heritage Mapping Project[7] identified important commercial fishing grounds between Point Sur and Point Conception on California's coast. This fishermen-led effort included input from fisherman from San Diego to Santa Cruz to collaboratively collect, synthesize, and present information. A similar fishermen-led project is underway on the northern California Coast (outside the two Call Areas addressed in this letter) and further demonstrates the efforts of fishing stakeholders in mapping and documenting important fishing grounds.

[5] National Marine Fisheries Service. 2024. Fisheries Economics of the United States, 2022. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-248, 28 p.
[6] pcouncil.org/documents/2022/07/july-2022-letter-to-nmfs-on-noaa-aquaculture-opportunity-areas.pdf/ (pages 11-13)
[7] Central Coast Fishing Heritage Mapping Project (CCFHMP)- Web Experience

Impacts and sensitive habitats in the California Current Ecosystem

This section addresses areas that should receive special concern and analysis, and other socioeconomic, biological, and environmental information (topics (e) and (f) in the BOEM Federal Register Notices).

The Pacific Ocean off the California coast is one of the world's most biologically productive and diverse marine ecosystems. California's Outer Continental Shelf region encompasses biologically important systems, including the Southern California Bight, island marine ecosystems, and the Central Coast upwelling zones that support highly productive waters critical for the reproductive success of commercially important fish species. These regions support extensive kelp forests, rocky reefs, and coral and sponge habitats, which in turn support important commercial and recreational fisheries, tourism, and coastal communities.

Under the EFH provisions of the MSA, the Council has designated 77 Essential Fish Habitat Conservation Areas (EFHCAs) in Federal waters off the U.S. West Coast, established to protect important habitats for Pacific Coast Groundfish. All or parts of 18 EFHCAs are located within the Central California Call Area, and 26 are located within the Southern California Call Area. The Council has also designated 319,000 km^2 of the Exclusive Economic Zone from Mendocino Ridge to the U.S.-Mexico maritime boundary as the Deep-Sea Ecosystem Conservation Area (DECA).

The EFHCAs and the DECA were designated to protect important and sensitive benthic species and habitats vulnerable to seafloor disturbance. Fragile deep-sea coral and sponge communities provide structural habitat for Council-managed species, and nowhere on the West Coast is this more prevalent than the waters off Southern California. As noted previously, the entire West Coast contains sensitive habitats that are not appropriate for oil and gas development. Areas designated as EFHCAs, HAPCs, and the DECA are particularly vulnerable and warrant the highest level of protection.[8] (See Figure 1).

Summary

In summary, the Council concludes that O&G development is incompatible with Council's authorities and mandates to conserve and enhance marine habitats, ensure sustainable fisheries management, and take into account impacts to coastal communities. **The Council strongly objects to O&G leasing on the Pacific Coast, including within the Central and Southern California Call Areas**.

Thank you for your consideration of our comments. Please contact Kerry Griffin (Kerry.griffin@pcouncil.org) with any questions.

Sincerely,

Peter F. Hassemer

Council Chair

[8] Detailed information on EFHCAs, HAPCs, and the DECA can be found on the NMFS Northwest Region website and the NMFS National EFH website and Mapper.

KFG:ael

Enclosure: CA, OR, WA Governors Letter to US Dept. Interior & BOEM

Cc: Council Members

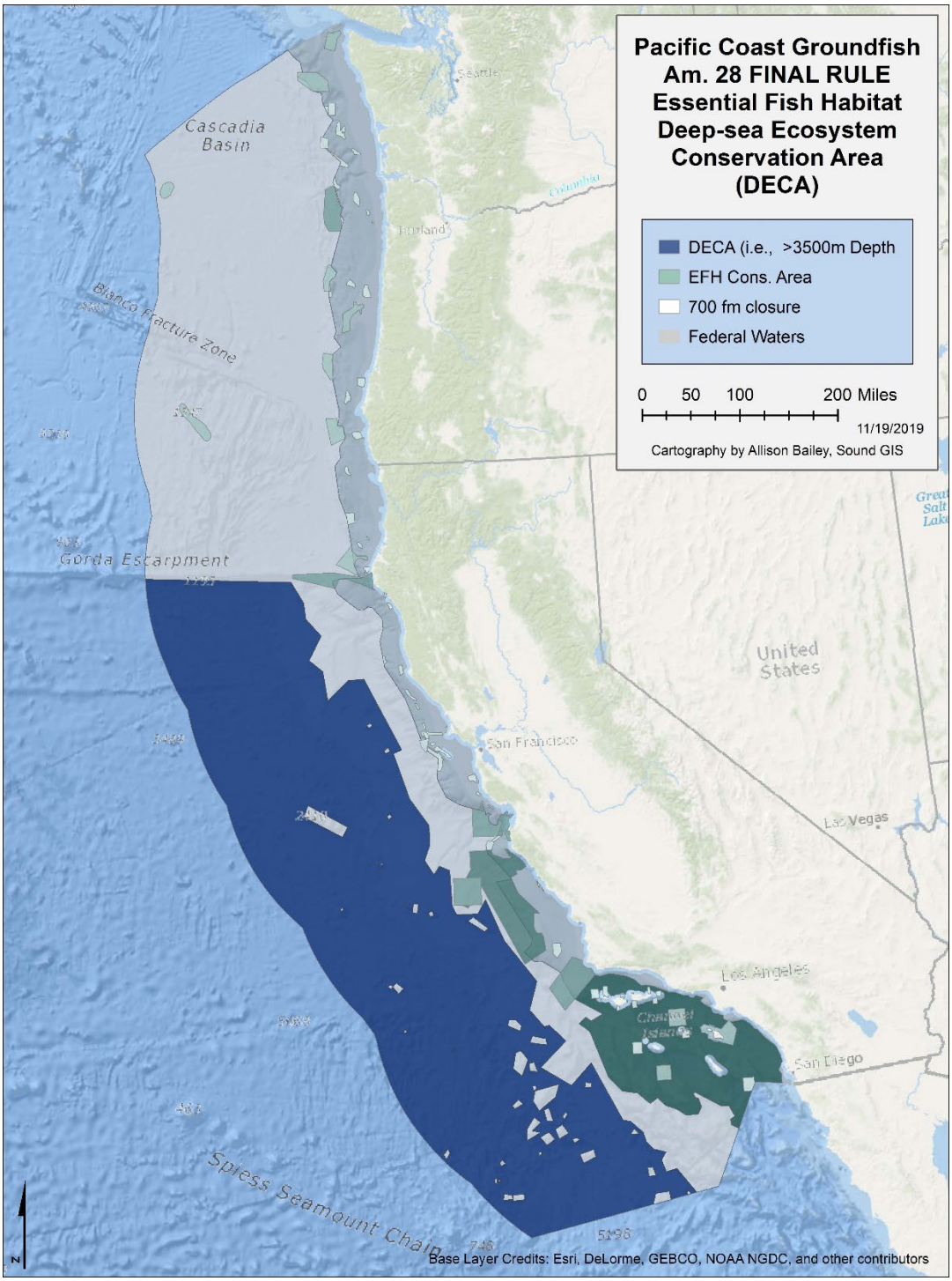


Figure 1. Deep-sea Ecosystem Conservation Area, Essential Fish Habitat Conservation Areas, and areas closed to bottom trawling in waters deeper than 700 fathoms. Shades of green for EFHCAs vary by the size of the closure, with larger area closures appearing darker.

January 23, 2026

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Ms. Kelly Hammerle
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Subject: Comments for the 11th National Outer Continental Shelf Oil and Gas Leasing Program

Dear Secretary Burgum:

As Governors of California, Oregon, and Washington, we vehemently oppose the inclusion of any new oil and gas lease sales off California's coast as proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program (OCS Program).

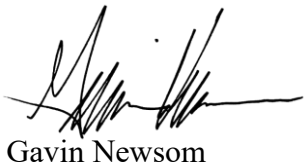
For over 20 years, the states of California, Oregon and Washington have been unified and definitive in our opposition to new offshore oil and gas development off the West Coast, given the devastating risks to our economies, communities, and environment. Any new oil and gas development off our coasts threatens the entire West Coast. Our opposition is joined by leaders across the political spectrum—including Republican elected officials along both coasts—who recognize that offshore drilling threatens their states' economies and coastlines. Decades of offshore drilling history have demonstrated that well blowouts, pipeline ruptures, and catastrophic spills are inherent risks of offshore drilling, not isolated incidents. A major spill could profoundly impact our region's ecosystems, commercial and recreational fishing, cultural resources, tourism, recreation, military operations and shipping across our shared coastline, with consequences for public health and safety and our multi-billion-dollar coastal economies. These disasters can take decades to remediate, with long-lasting impacts on marine ecosystems and the communities that depend on them.

Moreover, our states are deeply invested in a transition to a cleaner, reliable and affordable energy future. California, Oregon, and Washington work together to advance policies and investments that will expand access to clean energy, alternative fuels, and energy across the West Coast. While the Trump administration is making energy more expensive by doubling down on costly fossil fuels of the past and pulling the rug out from under solar and wind projects already under construction, China is racing ahead to dominate the clean energy economy of the future.

By clinging to outdated offshore oil drilling instead of investing in the technologies that create good-paying local jobs, the Trump administration is ceding American leadership and prosperity to our competitors and adversaries. Rather than expanding offshore oil development and taking our nation backwards to outdated and risky energy development, the federal government should prioritize energy investments and policies that reflect the innovation and technologies of the future. We urge you to accelerate the transition to clean, affordable energy and create economic opportunities that mitigate climate change.

For decades, the states of California, Oregon, and Washington have been unwavering in our opposition to new offshore oil and gas development. The risks to the thriving coastal economy and environment along the West Coast from additional OCS oil and gas exploration in California far outweigh the potential benefits. It is also notable that while this proposal puts our coastlines at risk, the Administration has conspicuously excluded waters off the East Coast. Given these risks, we strongly urge BOEM to remove all proposed oil and gas lease sales from the Pacific Region in the 11th National OCS Leasing Program.

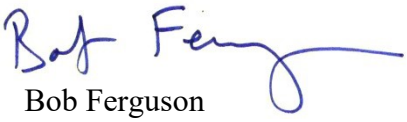
Sincerely,



Gavin Newsom
Governor of California



Tina Kotek
Governor of Oregon



Bob Ferguson
Governor of Washington