Pacific Fishery Management Council

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

March 30, 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: **Notice of Intent to Develop an Environmental Impact Statement on Oil and Gas Lease Sales in the Northern, Central, and Southern California Program Areas. Docket BOEM-2025-0681.**

Dear Ms. Sumait,

The Pacific Fishery Management Council (Council) appreciates the opportunity to provide comments on the Bureau of Ocean Energy Management's (BOEM) Notice of Intent to Develop a Programmatic Environmental Impact Statement (PEIS) on Oil and Gas (O&G) Lease Sales in the Northern, Central, and Southern California Program Areas. 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.

As previously communicated to BOEM, the Council strongly objects to O&G leasing in marine waters of the Pacific Coast. BOEM should select Alternative B (No Action) and not proceed with development of the PEIS.[1] 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 and sensitive habitats are likely to be irreversible and long-lasting. If BOEM moves forward with O&G leasing within the California Program Areas, the Council notes that although Alternative C would limit any lease sale to lease blocks containing existing infrastructure, it would nonetheless present unacceptable risk to the southern California marine ecosystem, its abundant fish populations, and thriving fishing industry.

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 includes provisions for conserving and managing marine, anadromous, and highly migratory fishery resources. The MSA also requires fishery management councils to describe, identify, conserve, and enhance essential fish

[1] January 2026 PFMC comment letter on BOEM OCS Oil and Gas Leasing Program.
February 2026 PFMC Comment letter on BOEM California Oil and Gas Leasing Program.

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 a 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.

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(a)(8)).

(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 fishing communities

Commercial and recreational fisheries operating within the Northern, Central, and Southern California Program Areas are major economic drivers for coastal and fishing communities[2] and the entire state. For 2025, the California Department of Fish and Wildlife (CDFW) reported commercial landings of 217,098,208 pounds, with an ex-vessel value of $212,988,819.[3] Note that ex-vessel revenue reflects the dollars paid to fishermen. It does not account for any downstream

[2] The term "fishing community" means a community which is substantially dependent on or substantially engaged in the harvest or processing of fishery resources to meet social and economic needs, and includes fishing vessel owners, operators, and crew and United States fish processors that are based in such community. 16 U.S.C. §1802(17).
[3] See - https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE/Commercial-Landings.

multipliers and economic benefits, nor does it include data from private recreational trips. In 2025, California's Commercial Passenger Carrying Vessels served 414,933 total anglers who collectively landed 2,396,230 fish.[4] The Council recommends BOEM engage with state and recreational fishery representatives to gather useful data and information on the importance of private vessel recreational fishing activities within each of California's Program Areas.

When considering the above, it is important to note that commercial fisheries for salmon were closed off California in 2025, and the recreational salmon fishery was greatly constrained. Because of this, the recreational fishing data likely understates the numbers we would expect in years without such a closure as the salmon fishery is vitally important to nearly all ports in California. There are indications the upcoming 2026 season will have even more opportunities for recreational fishermen while allowing a commercial fishery for the first time since 2022.

Both commercial and recreational fisheries within California Program Areas generate significant revenues in terms of license sales, taxes, and fees. They also support a number of dependent businesses including seafood processors, live bait providers, tackle and gear manufacturers, and distributors. The construction and ongoing presence of new 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 to the affected coastal communities. **The Council recommends BOEM obtain and evaluate all information related to commercial and recreational fishery effort, catch, and economic impacts in any environmental impact analysis**.

The Council recently submitted a comment letter[5] to the National Marine Fisheries Service (NMFS) 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. **The Council strongly recommends utilizing a spatial suitability analysis to ensure important fishing grounds within the Southern California Program Area are not considered for leasing.**

BOEM should also enlist the assistance of the fishing community and CDFW in identifying important fishing grounds and thoroughly analyzing all potential impacts. 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[6] identified important commercial fishing grounds between Point Sur and Point Conception on California's coast. This fishermen-

[4] *Ibid.*
[5] pcouncil.org/documents/2022/07/july-2022-letter-to-nmfs-on-noaa-aquaculture-opportunity-areas.pdf/ (pgs 11-13).

[6] Central Coast Fishing Heritage Mapping Project (CCFHMP)- Web Experience

led effort included input from fisherman from San Diego to Santa Cruz to collaboratively collect, synthesize, and present information. A similar fishermen-led project on the northern California Coast developed a story map to document important fishing grounds.

To summarize our fisheries-specific recommendations: as required by the National Environmental Policy Act, BOEM must evaluate the impact of its proposed Alternatives (including the No Action Alternative) on commercial and recreational fisheries, including effects on fish stocks, fishing communities, and related industries. To support this analysis, BOEM should obtain and evaluate all relevant fisheries data, including fishing effort, catch, and fisheries economic data that includes fishing communities. Additionally, BOEM should consult CDFW and fishing communities, including charter and private recreational fishery representatives, to identify important commercial and recreational fishing grounds within the Program Area(s) that are not reflected in existing fisheries databases. This information should be incorporated into a spatial suitability analysis to identify and evaluate potential socio-economic impacts and to ensure that important fishing grounds are not impacted by O&G leasing activities.

Impacts and sensitive habitats in the California Current Ecosystem

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 several ecologically important systems, including the Southern California Bight, island marine ecosystems, and the Central Coast upwelling zones that support highly productive waters critical for the growth and reproductive success of commercially important fish species. These systems support extensive kelp forests, rocky reefs, and deep-sea 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. 52 EFHCAs are located within the three California Program Areas. In addition, the Council 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 throughout the EEZ off California. These habitats are especially prevalent in waters off Southern California. As noted above, the entire West Coast contains sensitive habitats that are highly vulnerable to long-term harm from O&G development. Areas designated as EFHCAs, HAPCs, and the DECA are particularly vulnerable and warrant the highest level of protection.[7] (See Figure 1).

As required by the Natural Environmental Policy Act, BOEM must conduct a comprehensive analysis of the environmental risks and potential impacts of the Alternatives (including the No

[7] 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.

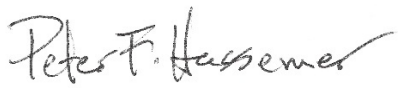
Action Alternative) on the marine and coastal ecological resources. To support this analysis, BOEM must obtain and evaluate all relevant ecological and environmental information. This information should be incorporated into a comprehensive, coastwide spatial analysis that includes spill scenarios and trajectories within a spatial planning framework to ensure meaningful risk assessment and impact analysis.

Summary

In summary, the Council concludes that O&G development is incompatible with its statutory authorities and mandates to conserve and enhance marine habitats, ensure sustainable fisheries management, and to consider impacts to coastal communities. **The Council strongly objects to O&G leasing on the Pacific Coast, including within the three California Program Areas, and urges BOEM to pursue the No Action Alternative**. **Any environmental analysis must thoroughly analyze all potential impacts to the ecological resources, fishing activities, and coastal communities.** A spatial analysis that incorporates these factors alongside potential oil spill scenarios demonstrates that there is no location for O&G leasing along the West Coast that does not pose significant risks to the marine environment, fisheries, and fishing communities. Any environmental review that fails to comprehensively analyze these impacts would be insufficient to inform sound decision-making.

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

Sincerely,



Pete Hassemer
Council Chair

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Cc: Council Members

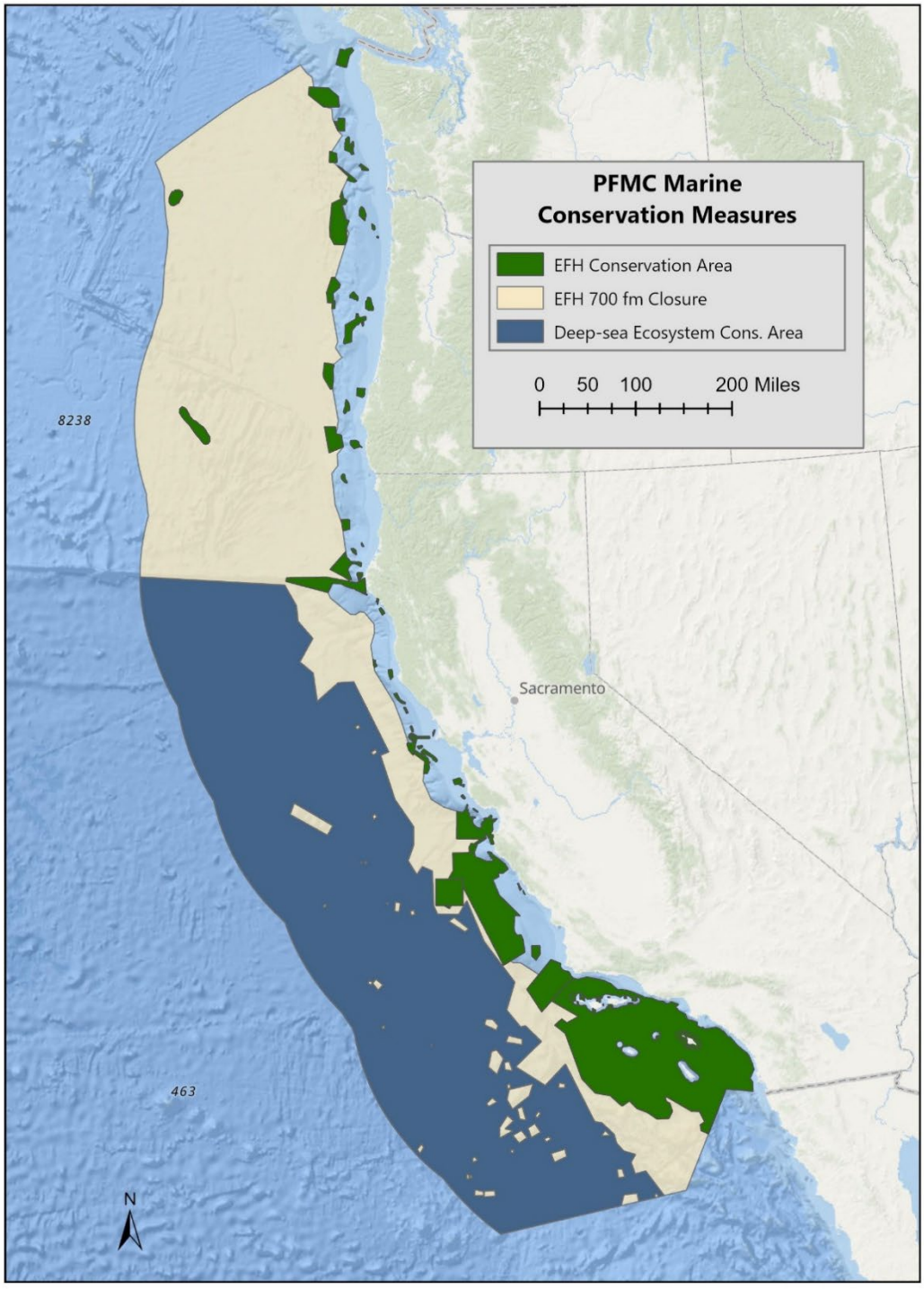


Figure 1. PFMC marine conservation measures: Deep-sea Ecosystem Conservation Areas, Essential Fish Habitat Conservation Areas, bottom trawl closure in waters deeper than 700 fathoms. Not shown: PFMC-HAPC, National Marine Sanctuaries and state conservation areas.