



June 15, 2025

****TRANSMITTED ELECTRONICALLY TO****

<https://www.regulations.gov/commenton/BOEM-2025-0015-0003>

TO (for reference only): Bureau of Ocean Energy Management (VAM-LD)
Attn: Ms. Kelly Hammerle
45600 Woodland Road
Sterling, VA 20166-9216

FR: Coalition for San Francisco Neighborhoods

Eileen Boken, State and Federal Legislative Liaison

RE: Request for Information and Comments on the Preparation of the 11th National Outer Continental Shelf Oil and Gas Leasing Program MMA 10400

Position: Strongly OPPOSING

BACKGROUND

The Coalition for San Francisco Neighborhoods (CSFN) is a 501(c)4 incorporated in 1972. The CSFN website is: <https://csfn.net/>

OVERVIEW

The Coalition for San Francisco Neighborhoods (CSFN) is basing its strong opposition to the 11th National Outer Continental Shelf Oil and Gas Leasing Program MMA 10400 not only on environmental grounds, but also on the viability of the business model on which it appears to be based.

Is there a viable business model for the California Planning Areas that represent a reasonable Return on Investment (ROI) based the high cost of doing business, on State and local regulatory requirements, potential legal challenges, and likely reputational damage?

Since 1969, the California State Lands Commission (SLC) has placed a moratorium on new offshore oil and gas leases in State waters due to a catastrophic oil spill off Santa Barbara.

In 1976, the State legislature passed the California Coastal Act which authorized the formation of the California Coastal Commission. Along with the Public Trust Doctrine under the jurisdiction of the SLC, the Coastal Commission sets high standards for the protection of coastal resources.

Since 1976, the State legislature has passed a long list of bills regarding offshore oil and gas drilling.

The most recent are: AB3233 (Addis) (2023-2024) and AB1866 (Hart) (2023-2024).

In 2017, the SLC passed a resolution opposing the "America First" offshore energy policy.

In 2018, the SLC submitted a letter to the Bureau of Ocean Energy Management (BOEM) urging BOEM to exclude California from the 2019-2024 National Oil and Gas Leasing Draft Proposed Program.

The SLC continues to support restrictions on offshore oil and gas drilling by supporting recent proposed congressional legislation.

The most recent are: HR2820 (Carbajal) (2025-2026), S22 (Feinstein) (2023-2024) and HR7608 (Lowey) (2019-2020).

Even pre-existing oil and gas operations are facing headwinds. The resumption of offshore oil operations in the Santa Ynez Unit off Santa Barbara by Sable Offshore Corp (formerly by ExxonMobil) is facing a number of regulatory challenges by local governments, local communities and State officials.

Here is the link to a Los Angeles Times article regarding the issues facing Sable Offshore Corp:

<https://www.latimes.com/california/story/2025-05-20/offshore-oil-production-resumes-santa-barbara>

CENTRAL CALIFORNIA PLANNING AREA

The San Francisco Bay Area is within the BOEM Central California Planning Area.

The San Francisco Bay Area has existing refineries which are supplied by tankers. This is a different infrastructure from the Southern California Planning Area which currently has active offshore oil rigs. Any new offshore oil and gas drilling in the Central California

Planning Area would have to compete with existing San Francisco Bay Area oil and gas infrastructure.

New oil and gas operations in the Central California Planning Area would require offshore platforms, onshore staging areas, onshore processing facilities and, most critically, would need onshore/offshore pipelines which transit California coastal waters.

California coastal waters extend from the mean high tide line to the three mile limit.

The California State Lands Commission and the California Coastal Commission could deny new permits to new offshore oil and gas infrastructure which seeks to transit through its coastal waters under the State's Public Trust Doctrine.

As it relates to the Central California Planning Area, the City and County of San Francisco is the second most densely populated city in the U.S. with only New York City being more densely populated.

San Francisco is sometimes referred to as Silicon Valley North.

The entire Westside of San Francisco is on the Pacific Coast. The boundaries of the City and County of San Francisco also include the Farallon Islands which are offshore. San Francisco's Pacific Coast is also in close proximity with both the Monterey Bay National Marine Sanctuary and the Greater Farallones National Marine Sanctuary.

Any oil spills from oil rigs off the coast of San Francisco would have catastrophic impacts on a densely populated city and on marine and wildlife off its coast.

It should also be noted that the City and County of San Francisco is in a seismically active area.

A section of the San Andreas Fault sits just off the coast. In 1906 the San Andreas Fault ruptured. The earthquake and ensuing fires destroyed 80% of the City.

Earthquakes are an ongoing threat with the most recent major earthquake in San Francisco occurring in 1989 and another major earthquake predicted to occur within the next thirty years.

All of this indicates that there is no viable business model for including the Central California Planning Area in the 11th National Outer Continental Shelf Oil and Gas Leasing Program MMA 10400.

All of this also indicates that there is no viable business model for including either the Southern California Planning Area or the Northern California Planning Area in the 11th National Outer Continental Shelf Oil and Gas Leasing Program MMA 10400.