STATE OF CALIFORNIA
EDMUND G. BROWN JR., *Governor*

CALIFORNIA STATE LANDS COMMISSION

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Established in 1938

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Kelly Hammerle
National Program Manager
Bureau of Ocean Energy Management
45600 Woodland Road, Mailstop VAM-LD
Sterling, VA 20166

RE: Request for Information and Comments on the Preparation of the 2019–2024 National Outer Continental Shelf Oil and Gas Leasing Program

Dear Ms. Hammerle:

The California State Lands Commission vociferously opposes including new oil and gas leasing in the Pacific Outer Continental Shelf (OCS) region in the new national Leasing Program for 2019-2024, which will replace the 2017-2022 Program, because offshore oil and gas development in this area creates undeniable peril to California's ocean and marine environment and economy.

The California State Lands Commission manages and protects over four million acres of land impressed with the public trust, including the beds of California's navigable, rivers, lakes, and streams, and its tide and submerged lands. The Commission manages oil, gas, and mineral resources in State waters and its jurisdiction extends along the State's coastline from the mean high tide line to three nautical miles offshore. The California Coastal Sanctuary Act, established in 1994, prohibits new oil and gas leasing in state waters in the Sanctuary area. California has not issued a new lease for offshore oil or gas development since 1968. In recent decades, the Commission has consistently opposed new offshore oil and gas development in the Pacific region of the OCS.

The catastrophic harm from an offshore oil spill is well established and universally acknowledged. Even with the newest technology and strongest safety precautions, the risk is unacceptably high. In the 1969 offshore oil spill in Santa Barbara County, staggering environmental and economic damage ensued. This catastrophe from a federal oil and gas lease resulted in nearly 4,000 birds dying, many marine mammals, such as sea lions and elephant seals dying, commercial fishing being suspended, and tourism plunging. The Deepwater Horizon spill in 2010 showcased the full force of an oil spill and the devastating effect on people, the ocean, and the communities sustaining the impacts.

As a State, California has perhaps the highest risk from an oil spill and the most to lose. What distinguishes California is that it is the sixth largest economy in the world and home to two of the largest ports in the Nation—the Long Beach and Los Angeles ports, which are a gateway for the entire United States. California's coastline supports commerce, tourism, recreation, fishing, navigation, marine transportation, public access, and abundant marine life. California's marine transportation and commerce and coastal tourism and recreation support local economies across the country. A thematic characteristic of California's economic drivers that contribute to the U.S. economy is that they are concentrated along California's coastline. California's coastal economies annually generate hundreds of billions of dollars in wages nationally and nearly $2 trillion in GDP. Suppose there was an oil spill from a federal platform or a pipeline or barge transporting oil—the impact to California's and the Nation's economy and environment is certain to be catastrophic.

The shift in California and the Nation from fossil fuels to renewable energy has been successful and is improving the environment. California is avidly transitioning to renewable energy and is a model for how to cultivate renewable energy, and its success has had a revolutionary effect. Already, a few dozen American cities have pledged to become 100 percent renewable.

In the midst of this shift, the Bureau of Ocean Energy Management is seeking comments about a new 2019-2024 National OCS Oil and Gas Leasing Program. New leases in the Pacific OCS have the potential to imperil California's economy and environment, and the nation's, and would expose California to an unreasonable risk of catastrophic harm. It is also paradoxical to our priorities of transitioning from unsustainable energy sources, like fossil fuels, to renewable energy for development, production and consumption.

The California State Lands Commission, along with the States of California, Oregon, and Washington, is steadfast in its opposition to new oil and gas lease sales in the Pacific OCS region and urges the Bureau of Ocean Energy Management to prohibit oil and gas lease sales in the Pacific OCS region in the new National Leasing Program for 2019-2024.

Sincerely,

Jennifer Lucchesi

JENNIFER LUCCHESI
Executive Officer

cc: Honorable Gavin Newsom, Lieutenant Governor and Chair of the Commission
Honorable Betty Yee, State Controller and Member of the Commission
Michael Cohen, Governor's Director of Finance and Member of the Commission
John Laird, Secretary, California Natural Resources Agency