



North Carolina
Coastal Federation
Working Together for a Healthy Coast

16 June 2025

Kelly Hammerle
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166

RE: Eleventh National Outer Continental Shelf Oil and Gas Leasing Program (Docket No. BOEM-2025-0015)

Dear Ms. Hammerle,

On behalf of the North Carolina Coastal Federation (Federation), we respectfully submit these comments regarding the Bureau of Ocean Energy Management's (BOEM) preparation of the 11th National Outer Continental Shelf Oil and Gas Leasing Program (Docket No. BOEM-2025-0015). We write to express our unequivocal opposition to the inclusion of any lease sales off the coast of North Carolina, and we strongly urge BOEM to permanently exclude these waters from consideration for offshore oil and gas leasing and seismic exploration.

The Federation is a non-profit organization dedicated to protecting and restoring the North Carolina coast. Our organization represents 16,000 supporters statewide and works with the public, agencies and local governments to communicate and collaborate wherever possible towards solutions that lead to the stewardship and resiliency of our coast. Since 1982, the Federation has been working with coastal communities and other partners to improve and protect coastal water quality and natural habitats, which are intricately tied to our coastal economy.

We are deeply concerned that this new leasing program considers currently protected and restricted areas, including the Southeastern U.S. coastline, for oil and gas development. This reconsideration runs counter to widespread public sentiment, economic common sense, and ecological science. It also directly contradicts the 2020 Presidential Memorandum signed by President Donald Trump, which withdrew these same areas—including North Carolina—from consideration for offshore oil and gas leasing through the year 2032. That decision was based on sound logic and robust public engagement. We strongly urge the current administration to uphold this commitment and maintain those protections in full.

Offshore Oil and Gas Leasing Threatens North Carolina's Coastal Economy

North Carolina's coast is an irreplaceable economic engine, cultural asset, and ecological treasure. Our coastal communities thrive because of clean beaches, abundant fisheries, and

unspoiled waters—not because of oil rigs and industrial drilling infrastructure.

In 2023, the state’s coastal economy generated approximately \$6.8 billion in GDP, supporting more than 30,000 jobs. In 2022, it generated \$2.5 in commercial and recreational fishing. Tourism and recreation alone account for over half of this activity—industries that rely on clean water, unspoiled beaches, and a healthy marine environment.

We know from decades of experience—and from the painful legacy of disasters like the Deepwater Horizon spill—that offshore drilling is inherently hazardous. Each phase of development—from seismic surveying to decommissioning—carries risks to marine biodiversity, water quality, and the integrity of coastal ecosystems. Even in the absence of catastrophic spills, standard discharges and cumulative degradation can significantly impair natural resources that are foundational to North Carolina’s economic success.

For North Carolina, the stakes are especially high. We have invested heavily in protecting and restoring coastal habitats, improving water quality, and supporting sustainable tourism and fisheries. Allowing offshore drilling would undermine these efforts overnight and threaten the very foundation of our coastal prosperity.

Seismic Blasting Threatens Marine Life and the Fishing Industry

Seismic airgun surveys, employed to locate subsurface hydrocarbon deposits, involve discharging high-decibel sound pulses into the ocean at 10–15 second intervals over prolonged periods. Peer-reviewed scientific literature has documented severe impacts of these activities, including displacement of commercially important fish species, disruption of spawning behavior, and auditory and navigational harm to marine mammals.

North Carolina’s marine environment is among the most biodiverse on the Atlantic seaboard. It is home to one of the highest concentrations of marine mammals, with 34 cetacean species and 4 seal species documented (Byrd et al., 2014; Roberts et al., 2016). Diverse and abundant marine fisheries result from the State’s unique position at the convergence of the Gulf Stream with southern reaches of the colder Labrador Current, and at the northernmost range of subtropical species and southern limits of coldwater species. The ecological consequences of seismic exploration in this region are substantial and pose direct threats to both commercial and recreational fisheries, as well as marine ecotourism enterprises such as whale watching and charter fishing.

Moreover, the potential economic impacts extend beyond biological systems. North Carolina hosts nationally recognized fishing tournaments and coastal events that generate considerable local revenue and employment. These industries depend on stable, healthy ecosystems that are fundamentally incompatible with the high-intensity disturbances introduced by oil and gas exploration.

Offshore Drilling is Incompatible with National Security Operations

North Carolina's coastal and offshore regions are also of strategic significance to national defense. The state hosts multiple military installations and offshore operational areas vital to the readiness of the United States Armed Forces. The Department of Defense has repeatedly expressed concern about the adverse effects of offshore oil and gas infrastructure on military training, radar functionality, and navigational safety.

Encroachment by commercial drilling operations would impose avoidable conflicts with these defense activities, potentially compromising national security interests. Strategic defense imperatives must be prioritized over speculative and environmentally risky fossil fuel development, particularly at a time when safer and more sustainable energy sources are readily available.

Unified, Bipartisan, and Overwhelming Public Opposition

The opposition to offshore drilling is not marginal or political—it is widespread, deeply rooted, and bipartisan.

Across the United States, more than 340 municipalities and over 2,100 elected officials have formally opposed offshore oil and gas drilling and seismic blasting. More than 250 of these municipalities are located along the Atlantic Coast. In North Carolina alone, 42 municipalities and 7 counties, representing broad swaths of the coast, have passed resolutions opposing offshore drilling. This includes a diverse range of voices from coastal residents, business leaders, local governments, and conservation organizations.

Furthermore, 22 members of the North Carolina General Assembly—Republicans and Democrats alike—have expressed their strong opposition. This consensus reflects not only a shared concern for our coastal environment and economy, but also a deep mistrust of the false promises and high risks that offshore oil and gas development bring. The bipartisan nature of this opposition should not be ignored. It represents a unified call to protect our coast from irreparable harm.

The Wrong Investment at the Wrong Time

As the world transitions to clean energy, doubling down on offshore oil and gas is both environmentally reckless and economically shortsighted. Rather than perpetuate reliance on carbon-intensive fuel sources, federal policy should prioritize the development of renewable energy, including offshore wind—a resource for which North Carolina possesses significant and well-documented potential.

Unlike offshore drilling, wind energy development can be managed in ways that minimize ecological harm, avoid interference with key economic sectors, and generate long-term employment and investment in clean technologies. A forward-looking energy strategy must support technologies that are environmentally sustainable, economically viable, and socially acceptable.

Conclusion and Recommendations

Offshore oil and gas development has no place off the coast of North Carolina. It threatens our coastal economy, environment, fisheries, and military interests. It poses unacceptable

risks to coastal communities, marine ecosystems, and national defense operations, while contradicting the clear and repeated opposition of North Carolina residents and elected officials.

These positions reflect a broad consensus among residents, businesses, local leaders, and conservation organizations. The unity of this opposition underscores a deeply held public interest in safeguarding the state's coastal resources for present and future generations.

We respectfully urge BOEM and the Administration to:

1. Permanently exclude North Carolina's coastal waters from the 11th National OCS Oil and Gas Leasing Program,
2. Uphold the protections established by the 2020 Presidential Memorandum withdrawing the Southeastern U.S. coast from leasing consideration through 2032, and
3. Prioritize responsible ocean stewardship and renewable energy development over short-term fossil fuel extraction.

Our coastal resources are far too valuable to place at risk. The North Carolina Coastal Federation stands in firm opposition to offshore oil and gas development and seismic exploration and urges BOEM to adopt a leasing plan that reflects sound science, public interest, and long-term sustainability.

Sincerely,

A handwritten signature in cursive script that reads "Kerri Allen".

Kerri Allen
Coastal Management Program Director