



Massachusetts Lobstermen's Association

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May 13, 2025

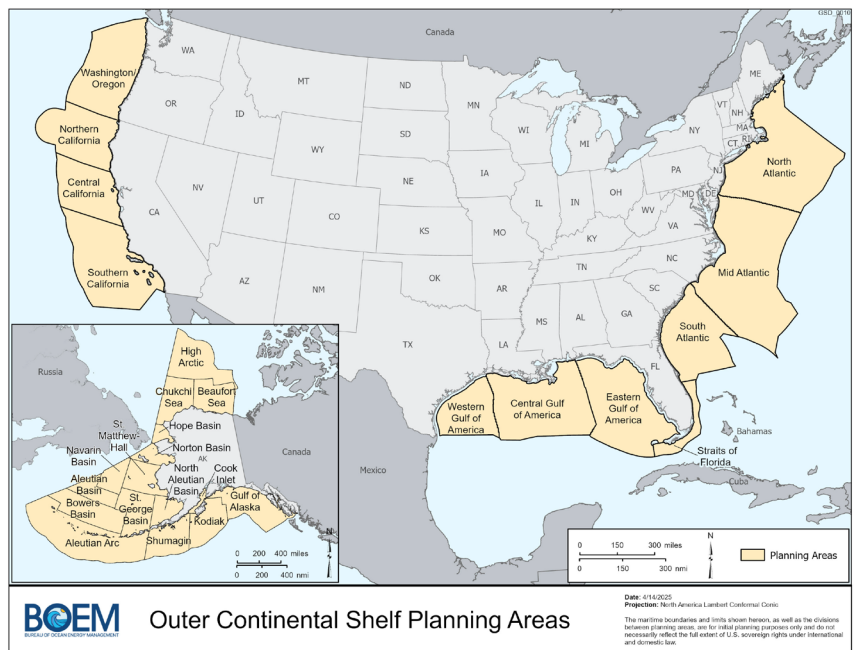
Kelly Hammerle
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166-9216

RE: Comments for the 11th National OCS Oil and Gas Leasing Program

Dear Ms. Hammerle,
The Massachusetts Lobstermen's Association (MLA) writes to you today with great concern on behalf of our ~1800 members that fish in these clean and pristine waters from Maine to New Jersey. The MLA does NOT support the proposed modification Bureau of Ocean Energy Management (BOEM) has made to its Outer Continental Shelf (OCS) planning areas, which are geographic subdivisions of the OCS that BOEM uses for planning and administrative purposes for oil and gas activities.

Established in 1963, the MLA is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests. The membership is comprised of fishermen from Maine to Cape May and encompasses a wide variety of gear types from fixed gear and mobile gear alike. The MLA continues to work conscientiously through the management process with the Massachusetts Division of Marine Fisheries, Atlantic States Marine Fisheries, Atlantic Large Whale Take Reduction Team, and the New England Fisheries Management Council to ensure the continued sustainability and profitability of the resources in which our commercial fishermen are engaged in.

The commercial fishermen are ecological stewards of the sea as they depend upon a healthy ecosystem to provide clean protein to consumers. And now BOEM is going to open these areas to oil and gas leasing which has already had devastating impacts on the ecosystem.

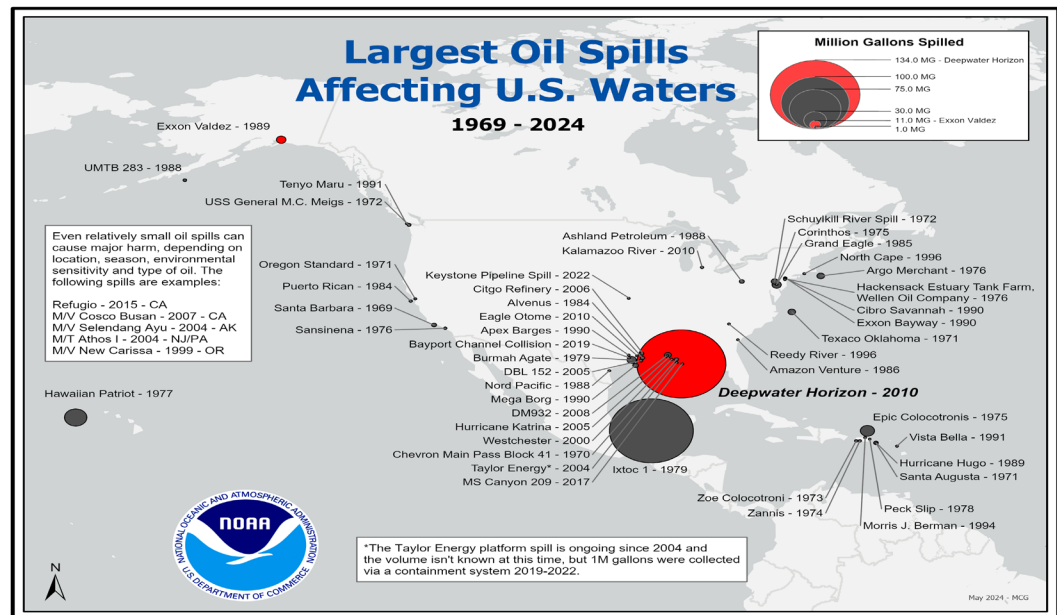


The top three oil catastrophes in the United States have had a lasting and devastating impact on the ecosystem and economies that depend on a clean and pristine ecosystem.

1. The worst oil spill in US history was the Deepwater Horizon oil spill in the Gulf of Mexico, which occurred in 2010. The explosion and sinking of the Deepwater Horizon rig resulted in an estimated 3.2 million barrels of oil spilling into the ocean.
2. The Exxon Valdez tanker ran aground in Prince William Sound, Alaska, spilling over 11 million gallons of oil. This spill resulted in significant damage to the marine ecosystem and had long-lasting impacts.
3. A blowout on an offshore platform off the coast of Santa Barbara, California spilled over 4 million gallons of oil. This spill helped raise environmental awareness and led to the passage of the Clean Water Act in 1972.

This passage is taken directly from the National Oceanic and Atmospheric Administration's (NOAA) website highlighting the numerous oils spills that happen [Thousands of spills occur in U.S. waters annually—most small, less than one barrel. This infographic shows where and when spills over 10,000 barrels or 420,000 gallons have occurred.](#)

Where is the common sense in even considering the leasing of the OCS for oil and gas explorations. [These spills can threaten life, property, and public natural resources. They can also substantially disrupt marine transportation with potential widespread economic impacts.](#)



The Massachusetts Lobstermen's Association strongly encourages you to NOT allow the 11th National OCS Oil and Gas Leasing Program to occur and help our commercial fishermen continue to harvest seafood from these clean and pristine waters in the United States of America.

Thank you for your thoughtful deliberation and continued support for the commercial lobster industry here in Massachusetts.

Sincerely, *Beth Casoni*, Executive Director

Submitted through the regulations.gov web portal at <https://www.regulations.gov/document/BOEM-2025-0015-0003>