

February 26, 2026

VIA ELECTRONIC FILING

Bureau of Ocean Energy Management
Pacific Region
Office of Strategic Resources
760 Paseo Camarillo (CM 102)
Camarillo, California 93010

Re: Call for Information and Nominations for Central California Outer Continental Shelf Oil and Gas Lease Sales Proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program, Docket Nos. BOEM-2025-0582, BOEM-2025-0583

To the Bureau:

The North American Submarine Cable Association (“NASCA”) urges the Bureau of Ocean Energy Management (“BOEM”) to account for and protect the considerable number of submarine telecommunications cables deployed throughout the Outer Continental Shelf (“OCS”) in the Southern California and Central California Planning Areas as it identifies specific areas for oil and gas leasing, avoiding areas where sufficient spatial separation (based on industry recommendations and guidelines) between oil and gas exploration and exploitation activities and existing infrastructure cannot be achieved to avoid damage to such critical infrastructure.¹ NASCA further urges BOEM to ensure that any proposed lease terms expressly (i) require sufficient spatial separation between oil and gas activities consistent with such industry recommendations and guidelines; (ii) require early and active coordination with submarine cable owners and operators whose cables transit lease areas; (iii) notify grantees of potential consequences of damages to submarine cables; and (iv) require coordination with operators of future proximate submarine cables.

NASCA notes with concern that the Call Notices raise potential use conflicts, such as “navigation, recreation, and fisheries” but make no mention of submarine telecommunications

¹ See Call for Information and Nominations for Central California Outer Continental Shelf Oil and Gas Lease Sales Proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program, 91 Fed. Reg. 3537 (Jan. 27, 2026) (“Southern California Call Notice”); Call for Information and Nominations for Central California Outer Continental Shelf Oil and Gas Lease Sales Proposed in the 11th National Outer Continental Shelf Oil and Gas Leasing Program, 91 Fed. Reg. 3534 (Jan. 27, 2026) (“Central California Call Notice” and, together with the Southern California Call Notice, “Call Notices”).

cables, even though BOEM’s 11th National OCS Oil and Gas Leasing Draft Proposed Program 1st Analysis and Proposal expressly states that “critical infrastructure includes submarine cables, which are present in all Pacific Region planning areas.”² NASCA requests that BOEM incorporate consideration of submarine telecommunications cables at all stages of its leasing program to ensure protection for both existing and future infrastructure. In doing so, BOEM should actively coordinate with other agencies with licensing and policy responsibilities for submarine cables and telecommunications sector critical infrastructure to ensure optimal infrastructure deployment on the OCS.

1. Background on NASCA and Submarine Cables

NASCA is the primary trade association for submarine cable operators, submarine cable maintenance authorities, and prime contractors for submarine cable systems operating in or connecting to North America.³ The submarine cable industry is a key stakeholder with respect to proposed uses of the OCS, as its members have dozens of submarine cables transiting the California OCS, as illustrated in Exhibit A.

The U.S. Government has long treated submarine telecommunications cables as critical infrastructure vital to U.S. national security and economic interests. As BOEM recognized in the First Program Proposal, “[s]ubmarine cables carry vital voice, data, and internet traffic.”⁴ Indeed, submarine telecommunications cables form the backbone of our modern digital infrastructure. Submarine cables—not satellites—continue to carry approximately 99 percent of the world’s Internet, voice, and data traffic.⁵ Activities that rely upon submarine cables span the full range of economic and social activities: submarine telecommunications cables enable

² Bureau of Ocean Energy Mgmt., 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program: 1st Analysis and Proposal § 8.2.5 (2025) (“First Program Proposal”).

³ NASCA’s members include Alaska Communications System; Alaska United Fiber System Partnership; Alcatel Submarine Networks; AquaComms; AT&T Corp.; C&W Networks; Edge Network Services; EXA Infrastructure; FLAG Telecom; Global Marine Systems Ltd.; GlobeNet; Google, LLC; IT International Telecom; Lumen Technologies UK, Ltd; Mertech Marine; OPT French Polynesia; PC Landing Corporation; Rogers Communications; Seaborn Networks; Southern Caribbean Fiber; Southern Cross Cable Network; SubCom, LLC; Tampnet Group; Tata Communications (Americas); Telstra; Telxius Cable USA, Inc.; Verizon; Vodafone; and Zayo Group Ltd. See Member Companies, North American Submarine Cable Association, <https://www.n-a-s-c-a.org/member-companies/>.

⁴ First Program Proposal § 8.2.5.

⁵ Doug Brake, *Submarine Cables: Critical Infrastructure for Global Communications*, Info. Tech. & Innovation Found., at 1 (Apr. 2019), <https://www2.itif.org/2019-submarine-cables.pdf>.

Internet connectivity and electronic commerce, global payment networks, mobile wireless backhaul, government and military communications, telemedicine, research, remote work and video conferencing, and communications with friends and family.⁶ This reliance is growing—with more cables planned—as our cultural, social, economic and national security institutions and activities increasingly depend on digital, cloud-based platforms. It is imperative that the protection of submarine cable infrastructure be a key priority for BOEM as well as for potential lease holders for oil and gas exploration and exploitation on the California OCS. It is equally imperative that BOEM’s leasing programs take into account not just existing submarine telecommunications cables, but the need for future deployments to accommodate growing demand and enhance resilience through route diversity.

Although the United States has not signed the Law of the Sea Convention,⁷ it is a party to the Convention on the Continental Shelf, which provides that “subject to its right to take reasonable measures for the exploration of the continental shelf and the exploitation of its natural resources, the coastal State may not impede the laying or maintenance of submarine cables or pipelines on the continental shelf.”⁸ The United States has also long recognized as customary international law the freedom to install and maintain submarine cables beyond the limits of the U.S. territorial sea. Presidential proclamations by two different U.S. presidents expressly stated that the establishments of an Exclusive Economic Zone (“EEZ”) and a contiguous zone, respectively, did not infringe on the high-seas freedoms to lay and repair submarine cables.⁹

⁶ See International Cable Protection Committee, *ICPC Calls on Governments and Industry to Facilitate and Expedite Submarine Cable Installation and Repair During the COVID-19 Pandemic in Order to Protect Internet Connectivity and Critical Communications* at 1 (Apr. 3, 2020), <https://www.iscpc.org/documents/?id=3299>.

⁷ United Nations Convention on the Law of the Sea, 1833 U.N.T.S. 397 (Dec. 10, 1982) (entered into force on Nov. 16, 1994) (“UNCLOS”).

⁸ Geneva Convention on the Continental Shelf, art. 4, 15 U.S.T. 471, T.I.A.S. 5578, 499 U.N.T.S. 311 (Apr. 29, 1958) (entered into force definitively for the United States on June 10, 1964) (“Continental Shelf Convention”).

⁹ See Proclamation No. 5030, 48 Fed. Reg. 10605 (Mar. 10, 1983) (“Pres. Proc. No. 5030”) (establishing the U.S. EEZ); Proclamation No. 7219, 64 Fed. Reg. 48701 (Aug. 2, 1999) (establishing the U.S. contiguous zone).

U.S. law establishes punishable offenses for willful, culpably negligent, or negligent damage to submarine cables.¹⁰ These statutory provisions implement a U.S. treaty obligation dating back to 1888.¹¹ U.S. law recognizes the right of cable owners to sue for damages in addition to the existence of statutory offenses.¹² Nevertheless, submarine cable operators prefer to minimize the risk of damage in the first instance.

2. Risks of Damage and Route Foreclosure

Uncoordinated oil and gas leasing poses a number of risks to submarine cables, including:

- Direct physical disturbance or damage through anchoring of production platforms and semi-submersible drill rigs, support vessels, barges, and tankers; core sampling; use of drills dredges, hydraulic jets, cutting tools; and use of ROVs;
- Impeded access to submarine cables for maintenance, repair, and recovery of out-of-service cables by large offshore developments—both at the surface (for cable ships) and on the seafloor (for cables); and
- Pipeline crossings may harm cables during installation, operation, and maintenance activities and add significant complexity during repair operations for both—although crossing agreements are often used to mitigate some of these risks.

Designation of large and/or contiguous lease areas can also foreclose routes for future submarine cables, limiting the ability of submarine cable owners and operators to meet increasing demand and enhance resilience. This is a particular concern in the California OCS, where future submarine cable infrastructure route availability is constrained by existing national marine sanctuaries, such as the Monterey Bay, Chumash Heritage, and Channel Islands National Marine Sanctuaries.

3. Recommended Actions in this Proceeding

To mitigate the risks of damage from uncoordinated oil and gas exploration and exploitation and of route foreclosure in the Call Areas, NASCA urges BOEM to take the following steps.

- ***Geographic Limitations and Disclosures.*** BOEM should seek to define lease areas for sale where exploration or exploitation will not pose potential risks of damage to

¹⁰ 47 U.S.C. §§ 21–22.

¹¹ Convention for the Protection of Submarine Telegraph Cables, arts. I–III, Mar. 14, 1884, 24 Stat. 989, 25 Stat. 1424, T.S. 380, (entered into force definitively for the United States on May 1, 1888) (“1884 Convention”).

¹² 47 U.S.C. § 28.

existing submarine cables. Where a lease area cannot be defined to avoid existing submarine telecommunications cable infrastructure, BOEM should establish default separation distances prohibiting oil and gas activities within a proscribed distance of an existing submarine cable absent evidence of coordination and agreement with the submarine cable operator adopting appropriate mitigation measures to protect the submarine cable. BOEM should rely on the guidance and distances identified by the Communications, Security, Reliability and Interoperability Council (“CSRIC”) of the Federal Communications Commission (“FCC”), which recommended default spatial separation of submarine cables from each other and other marine infrastructure in ocean depths of more than 75 meters of the greater of (a) 500 meters or (b) two and half times of the depth of water, with closer proximity possible upon coordination between the affected parties.¹³ As explained in some detail in the CSRIC Spatial Separation Report, these separation distances are dictated by the operational requirements of submarine cable repair, which involve grapnel runs to recover a damaged or out-of-service cable, repair the damaged cable on the ocean surface with splicing in of new and additional cable, and return of the repaired cable in a U-shaped configuration on the seafloor.

- ***Stakeholder Engagement and Diligence.*** Consistent with its First Program Proposal stressing that “coordination between ocean users and submarine cable operators is an important aspect to consider prior to conducting OCS operations,”¹⁴ BOEM should expressly identify submarine cable owners, operators, maintenance providers, and companies recovering out-of-service cables as stakeholders with whom lessees should coordinate early and regularly in the planning process for exploration and exploitation activities. Even where there are no geographic exclusions, BOEM should identify in a Notice of Sale proximate submarine cables to alert potential bidders of the need for submarine cable protection and coordination.
- ***Bid Requirements and Lease Terms.*** BOEM should require that bids specifically address submarine cable protection and coordination and prohibit exploration and exploitation activities within proscribed distances of existing submarine cables absent agreed mitigation with the submarine cable operator. BOEM should encourage the

¹³ See Communications Security, Reliability and Interoperability Council, Working Group 8, Submarine Cable Routing and Landing Final Report—Protection of Submarine Cables Through Spatial Separation at 58 (2014) (“CSRIC Spatial Separation Report”), https://transition.fcc.gov/pshs/advisory/csric4/CSRIC_IV_WG8_Report1_3Dec2014.pdf; International Cable Protection Committee, Recommendation No. 2, Issue 12C, *Recommended Routing and Reporting Criteria for Submarine Telecommunications Cables in Proximity to Other Such Cables*; International Cable Protection Committee, *Government Best Practices for Protecting and Promoting Resilience of Submarine Telecommunications Cables* § 3, <https://iscpc.org/documents/?id=3733> (“ICPC Best Practices”).

¹⁴ First Program Proposal § 8.2.5.

use of advanced technologies, including acoustic beacons and drones, to facilitate cable protection and potentially greater proximity of submarine cables and oil and gas activities.

- ***Interagency Coordination.*** BOEM should also consult and coordinate with those agencies with licensing and policy responsibilities for submarine cables and telecommunications sector critical infrastructure, including the FCC, the U.S. Department of Commerce’s National Telecommunications and Information Administration, and the U.S. Department of Homeland Security. The CSRIC Spatial Separation Report (which was drafted with input from both BOEM and the Federal Energy Regulatory Commission) urges the FCC and submarine cable operators to “work with other U.S. Government agencies and other stakeholders to consult with and among each other at the earliest possible time to address spatial requirements for submarine cables and their relationship to other proposed marine activities and infrastructure.”¹⁵

In taking these steps, NASCA asks that BOEM seek to ensure that coordination between submarine cables and oil and gas companies takes place at the earliest stages of project planning, when the chances of modification and compromise are greatest.¹⁶ BOEM should not defer coordination to the implementation phase (as it has done with its COP Guidelines for renewables projects), as coordination is much more difficult once a project has been designed and financed.

4. **Call for Development of Comprehensive Cable Protection Regulations and Guidance**

More generally, NASCA urges BOEM to establish a planning and leasing process for oil and gas leasing on the California OCS that ensures coordination between submarine cables and oil and gas activities at all stages of the leasing program—from defining lease areas to soliciting proposed bidders and planning and developing projects. In particular, NASCA urges BOEM (a) to continue to use—and encourage potential lessees to use—government and commercial mapping resources—including NASCA mapping resources—to identify potential overlaps between existing and planned submarine cables; (b) require coordination with submarine cable interests within lease areas and require sufficient spatial separation consistent with industry recommendation and guidelines (absent other agreement between the parties); and (c) coordinate with other government agencies with submarine cable licensing and policy responsibilities to develop a long-term, forward-looking program that promotes the growth, protection, and resilience of both industries.

* * * * *

¹⁵ See CSRIC Spatial Separation Report at 57.

¹⁶ See ICPC Best Practices § 6.

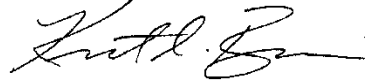
Bureau of Ocean Energy Management

February 26, 2026

Page 7

NASCA appreciates the opportunity provided by BOEM to comment in this proceeding and urges BOEM to undertake the actions noted above to ensure protection of submarine cables within the Call Areas and more generally.

Yours sincerely,



Kent Bressie

Colleen Sechrest

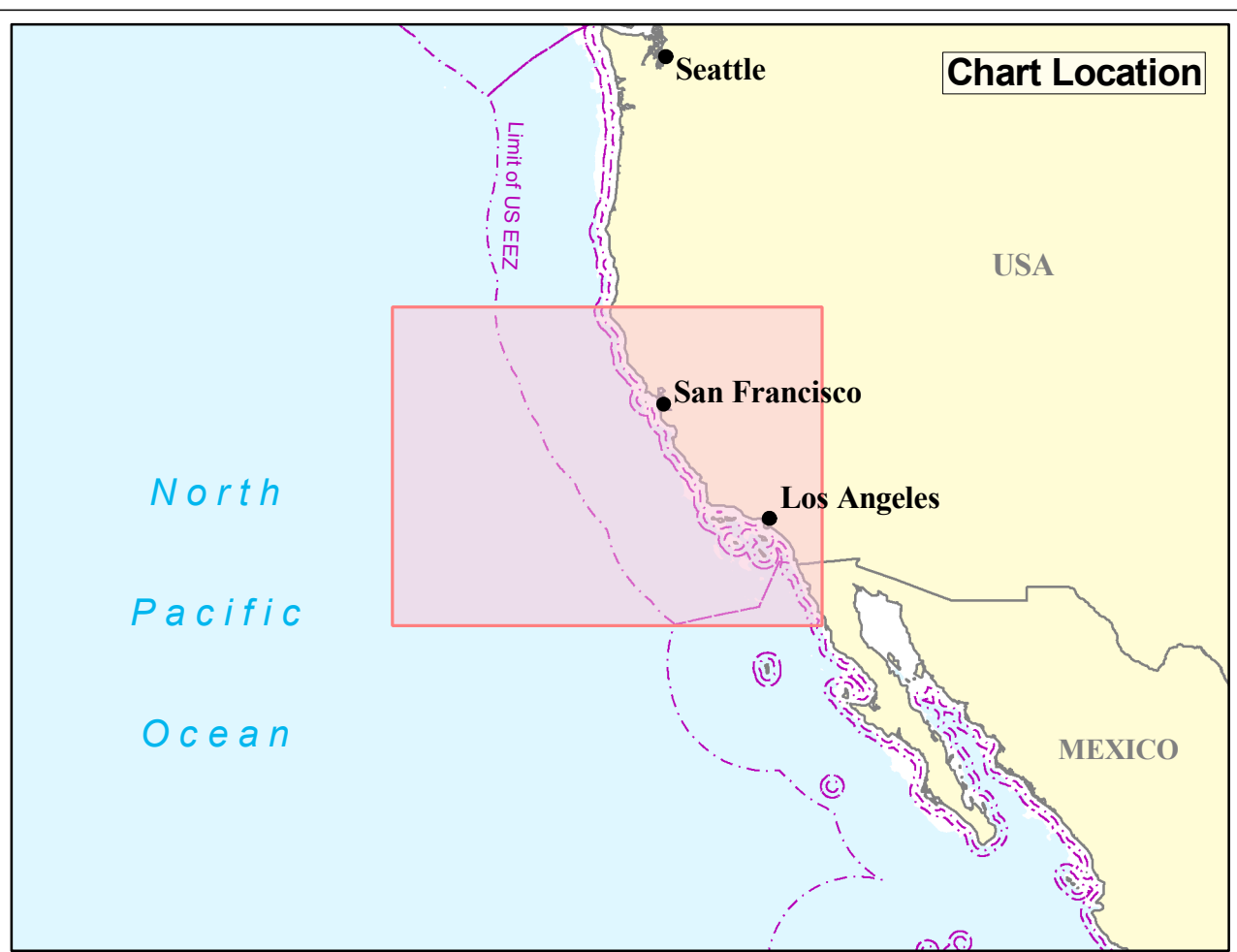
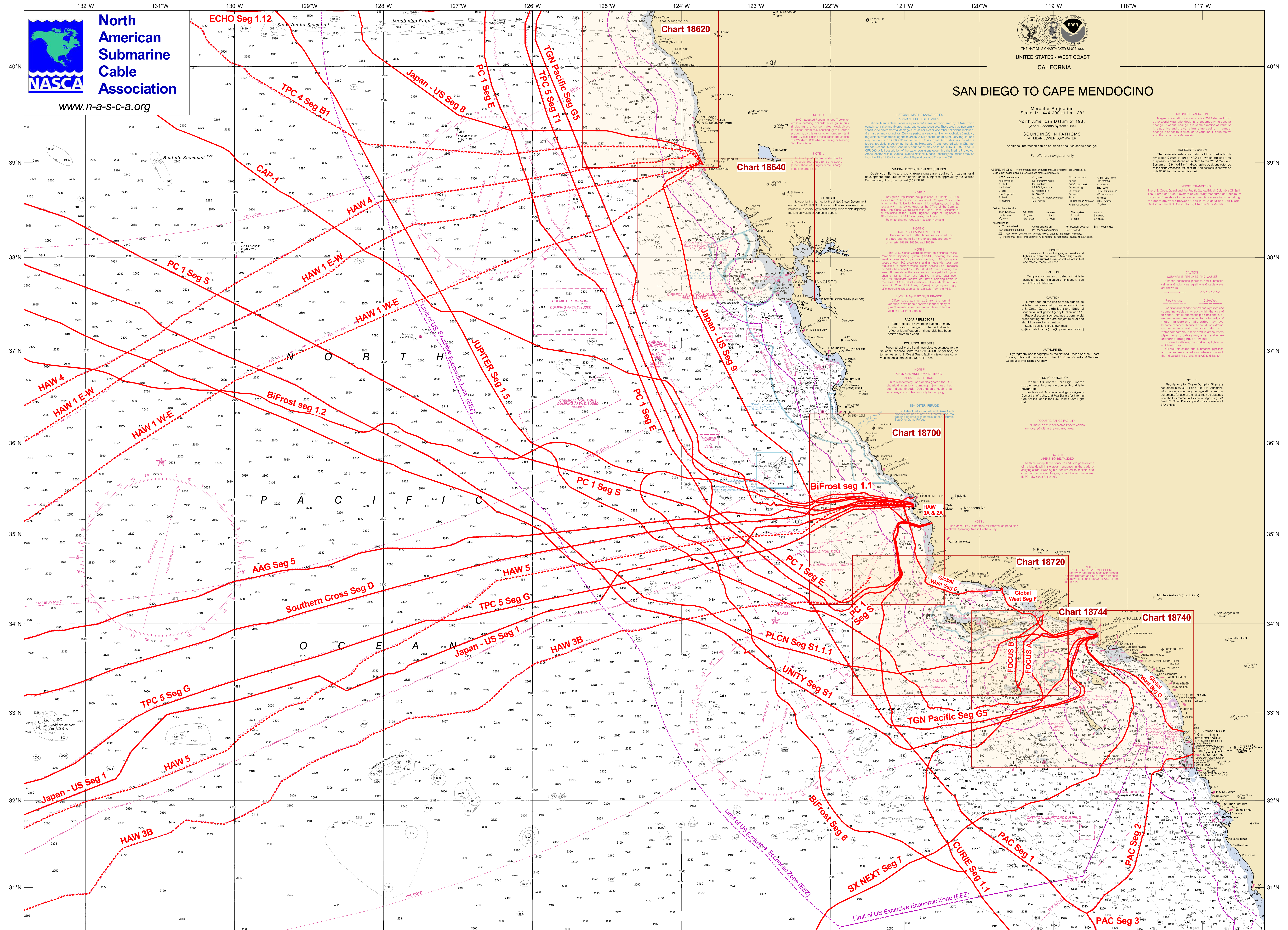
*Counsel for the
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Attachments

cc: Denise Coca (FCC)
Thomas Sullivan (FCC)
Aris Kourkomelis (DHS)
Joseph Alm (DHS)
Dillon McGregor (DHS)

EXHIBIT A:

NASCA SUBMARINE CABLES ON THE CALIFORNIA OCS



LEGEND

- NASCA Member Cables In Service
- NASCA Member Cables Out of Service
- Maritime Boundaries

General Note

These cables are plotted based on the best available data from cable owners and members of the North American Submarine Cable Association (NASCA) at the time of production.

Please be aware that there may be other cables in the area that are not depicted on this chart.

CABLE & CONTACT INFORMATION			
Cable System	Status	Owner	Emergency Contact No.
AAG Segment 5	In Service	AT&T	1-866-466-2288, Prompt 5
BiFrost	In Service	Telstra	+1-213-518-3800
CAP-1	In Service	Indigo Subsea	(719) 307-0915
CURIE Segment S1.1	In Service	Google	+1-732-578-7474
ECHO Segment 1.12	In Service	Telstra	+1-213-518-2800
FOCUS Cable A	In Service	US Navy	+1-805-989-0910
FOCUS Cable B	In Service	US Navy	+1-805-989-0910
Global West Segment E, F & G	In Service	Zayo Networks	866-236-2824
HAW 1 E-W	OOS	AT&T	1-866-466-2288, Prompt 5
HAW 1 E-W	OOS	AT&T	1-866-466-2288, Prompt 5
HAW 2A, 3A & 3B	OOS	AT&T	1-866-466-2288, Prompt 5
HAW 4 & 5	OOS	AT&T	1-866-466-2288, Prompt 5
Jupiter Segment 1.5	In Service	Meta	+81-3-3270-6594
Japan - US Segment 1	In Service	Verizon	1-877-572-8989

Cable System	Status	Owner	Emergency Contact No.
Japan - US Segment 8	In Service	AT&T	1-866-466-2288, Prompt 5
Japan - US Segment 9	In Service	AT&T	1-866-466-2288, Prompt 5
PAC Segment 1, 2 & 3	In Service	Lumen Technologies	1-877-681-9205
PC 1 Segment E	In Service	PC Landing Corp	+44-7800-626888
PC 1 Segment S	In Service	PC Landing Corp	+44-7800-626888
PLCN	In Service	PLCN Consortium	+1-732-578-7474
Southern Cross Segment D	In Service	SCN/Verizon	+1-877-572-8989
SX NEXT Segment 7	In Service	SCN	+1-877-572-8989
TGN Pacific Segment G5	In Service	Tata	1-732-282-4001
TPC 4 Segment B1	OOS	AT&T	1-866-466-2288, Prompt 5
TPC 5 Segment G	In Service	AT&T	1-866-466-2288, Prompt 5
TPC 5 Segment T1	In Service	AT&T	1-866-466-2288, Prompt 5
UNITY Segment S1	In Service	Unity Consortium	+1-973-216-2096

[Emergency Contact Information](#)

In the event you one become entangled in one of the submarine cables shown on this chart please contact the relevant owner listed on this chart 24 hours a day, seven days a week.

[For General Information](#)

For non-emergency information regarding any of the cable systems shown on this chart, or for marine planning purposes, please contact: cableinfo@N.A-S-C-A.org

NATURAL SCALE 1 : 1,444,000 at 38°00' N

0 20 40 60 80 100 Miles

0 20 40 60 80 100 Nautical Miles

SPHEROID & DATUM : WGS84

PROJECTION : MERCATOR

Notes:

This chart is intended for general reference only and **NOT FOR NAVIGATION PURPOSES.**

Please be aware that other cables may exist in addition to those shown on this chart.

SOUNDINGS IN FATHOMS
AT MEAN LOW WATER

CHART HISTORY

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Global Marine Systems Limited, Chelmsford,
United Kingdom

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CHART BACKGROUND:

NOAA Chart 18020, 39th Edition, January 2012

For more information see:
www.nauticalcharts.noaa.gov

Global Marine

NASCA Cable Awareness Chart

California Region

Chart no. 18020

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