June 4, 2025

Ms. Kelly Hammerle

Bureau of Ocean Energy Management

45600 Woodland Road

Sterling, VA 20166

Re: Opposition to Offshore Oil and Gas Lease Sales in BOEM's 11th National OCS Leasing Program

Dear Ms. Hammerle,

On behalf of LRNow, Virginia Beach's leading environmental nonprofit organization, and our 15,000 members, I am writing to express our strong opposition to any inclusion of Virginia's outer continental shelf in the Bureau of Ocean Energy Management's (BOEM) forthcoming 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program. Offshore drilling in federal waters off the coast of Virginia poses grave threats to our environment, economy, national security, and climate goals.

Environmental and Ecosystem Risks

Virginia's coastal waters - including the Chesapeake Bay, the nation's largest estuary- support over 3,600 species of fish, birds, mammals, and plants, many of which are already threatened or endangered. Routine discharges and the average annual release of some 157,000 barrels of oil from offshore infrastructure would devastate these fragile ecosystems and reverse decades of painstaking restoration work. Moreover, seismic surveys alone - using high-intensity airguns - can cause permanent hearing damage to whales, dolphins, and sea turtles, disrupt critical spawning and feeding grounds, and undermine migratory patterns.

Economic and Community Impacts

The health of Virginia's coastal communities hinges on clean water, healthy fisheries, and vibrant tourism. From commercial crabbing and oyster harvesting to recreational fishing charters and beach resorts, coastal economies generate tens of billions of dollars annually and employ thousands of Virginians. A single spill - or the cumulative effect of routine leakage - would jeopardize livelihoods, threaten public health, and stifle the tourism and seafood industries that are the lifeblood of our coastal towns.

National Security Concerns

The Department of Defense has identified the mid-Atlantic Shelf off Virginia as critical for naval training and testing. Oil rigs and seismic survey operations would not only interfere with exercises essential to naval readiness but also pose a risk of collisions with military vessels. Similarly, NASA's Wallops Flight Facility relies on unobstructed airspace and clear marine approaches for its launch schedule; offshore drilling operations would introduce unacceptable safety hazards and scheduling constraints.

Climate and Public Health Implications

Expanding fossil fuel extraction in federal waters is fundamentally at odds with our national and international commitments to reduce greenhouse gas emissions. The oceans have absorbed 90% of the excess heat from human-caused carbon emissions, fueling sea-level rise, stronger storms, and shifting marine currents that already imperil coastal infrastructure and freshwater supplies. Rather than doubling down on oil and gas, the Bureau of Ocean Energy Management (BOEM) should prioritize renewable energy investments that protect public health, reduce long-term costs, and create sustainable jobs.

Widespread Public and Political Opposition

Communities up and down the East Coast, West Coast, and Gulf Coast have repeatedly voiced their opposition to offshore drilling. Over 390 local governments and more than 55,000 businesses nationwide, including Virginia's coastal towns, have formally opposed new lease sales. In Congress, fifteen bipartisan bills have been introduced to shield our waters from new drilling and seismic testing. This broad coalition underscores the overwhelming consensus that offshore energy development is incompatible with coastal resilience and economic vitality.

In light of these environmental, economic, national security, and climate concerns, we urge BOEM to exclude Virginia's OCS from any lease sale in the 11th Program. Instead, we encourage the Department of the Interior to advance proposals for offshore wind, solar, and other renewable energy sources - solutions that align with our shared objectives of safeguarding coastal communities, fostering sustainable economic growth, and meeting our climate commitments. of safeguarding coastal communities, fostering sustainable economic growth, and meeting our climate commitments.

I appreciate your consideration of these comments. We stand ready to engage further and support policies that ensure a healthy, secure, and prosperous future for Virginia's coast.

Sincerely,

Karen Forget, Executive Director

Lynnhaven River NOW

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