Dear Mayor Dyer and Members of the Virginia Beach City Council,

On behalf of Lynnhaven River NOW, thank you for asking the Bureau of Ocean Energy Management to provide additional time for Virginia Beach and other affected communities to evaluate its proposal for potential commercial mineral leasing and seabed mining off Virginia's coast.

The extension of the public comment period was important. Since then, the record has only strengthened the case that this proposal should not advance toward leasing. We respectfully ask the City of Virginia Beach to submit a supplemental comment – or take other formal action – opposing offshore mineral exploration, leasing, and extraction in the area identified by BOEM.

Virginia Beach has a direct and substantial stake in this decision. The City's economy, identity, and quality of life depend on clean beaches, healthy fisheries, tourism, boating, recreation, military readiness, maritime commerce, and the health of the Chesapeake Bay and Atlantic Ocean. Industrial-scale seabed mining could place all of these established interests at risk for a speculative and unprecedented extractive industry.

The concerns now on the record extend far beyond environmental organizations:

- **Accomack County, Northampton County, and the Town of Chincoteague** have expressed opposition to advancing offshore mineral leasing.
- The **Virginia Spaceport Authority does not support moving the proposal forward**, citing potential conflicts with national space-launch operations, national security, maritime safety, and Virginia's long-term investment in aerospace infrastructure.
- The **Virginia Marine Resources Commission** has raised critical concerns about potential effects on finfish, crabs, shellfish, and recreational fisheries.
- Commercial fishermen, shellfish growers, seafood businesses, recreational anglers, charter captains, tourism operators, maritime interests, and fishery management organizations have warned of risks to seafloor habitat, water quality, fishing grounds, navigation, and coastal economies.

- Ocean City, Maryland, has also opposed the proposal, demonstrating that potential effects would not stop at Virginia's borders.

The comments from Ocean Harvesters illustrate the scale of economic exposure. The company operates Virginia-registered fishing vessels supplying the Omega Protein processing facility and reported that approximately **12% of its annual catch occurs within BOEM's proposed area, with another 50% occurring in adjacent Virginia waters** that could also be affected. Ocean Harvesters explained that BOEM has not provided enough information about where, when, or how mining would occur for the company to identify measures capable of protecting its fishery.

That lack of information is not a minor procedural issue. BOEM has not adequately explained the size or depth of potential mining operations, the duration and frequency of dredging, the location of processing activities, the movement of sediment plumes, the contaminants that could be released, or the potential consequences for fisheries, wildlife, shoreline stability, military operations, shipping, tourism, and recreation.

The proposed activity would involve industrial-scale disturbance and removal of the seafloor for its mineral value. It is not routine navigational dredging or beach nourishment. Potential impacts include the destruction of benthic habitat, increased turbidity, sediment plumes extending beyond the mining footprint, underwater noise, disruption of fish migration and feeding, and the possible release of heavy metals, radioactive materials, and other contaminants currently contained in bottom sediments.

These concerns are particularly important for Virginia Beach:

Tourism and Recreation: The City's beaches, clean water, fishing, boating, wildlife, and coastal character attract residents and visitors and support thousands of jobs. Even the perception of degraded ocean conditions could harm businesses that depend on public confidence in a healthy coast.

Fisheries and the Chesapeake Bay: Commercially and recreationally important species move between offshore waters, the Chesapeake Bay, and Virginia's coastal estuaries. Harm to offshore habitat or water quality cannot be treated as separate from the health of the Bay.

Military readiness and maritime safety: Virginia Beach hosts nationally significant military assets and lies near heavily used shipping approaches, training areas, and maritime routes. BOEM should not advance a new offshore industry without demonstrating

that it would create no conflicts with the Navy, Coast Guard, Port of Virginia, commercial shipping, or other existing ocean uses.

Beaches and coastal resilience: Removing large volumes of seafloor sediment raises unanswered questions about sediment movement, shoreline stability, erosion, and storm-wave protection. Virginia Beach already invests heavily in flood resilience and beach management and should not accept additional risk without reliable, independent analysis.

Virginia Beach has previously opposed offshore oil and gas drilling and seismic testing because of the risks industrial offshore development could pose to marine life, military operations, tourism, and the coastal economy. Although seabed mining is a different industry, many of the same principles apply: the City should not place established economic, environmental, and national-security interests at risk for poorly understood offshore extraction.

The extension gave communities more time to respond, but it did not resolve the proposal's fundamental shortcomings. The public record now demonstrates broad concern across local governments, fishing and aquaculture industries, tourism businesses, maritime organizations, state agencies, conservation groups, and strategic infrastructure operators.

There is too much at stake, too little information available, and too much uncertainty for BOEM to move this proposal toward leasing. We respectfully ask the City Council to clearly oppose commercial offshore mineral leasing and extraction off Virginia's coast and urge BOEM to discontinue the leasing process.

Lynnhaven River NOW would be glad to provide additional information, brief Council members or staff, and help connect the City with affected fisheries, businesses, scientists, and coastal stakeholders.

Thank you for your continued leadership in protecting Virginia Beach's economy, environment, military community, and coastal way of life.

Sincerely,

Dylan Mason // Public Policy Manager // Lynnhaven River NOW