



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Mark R. Herring
Attorney General

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Ms. Kelly Hammerle
National Program Manager, BOEM
45600 Woodland Road
Mailstop VAM-LD
Sterling, Virginia 20166

RE: Information and comments on the preparation of the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Program MAA104000 (82 Fed. Reg. 126, 30886 (July 3, 2017))

Dear Ms. Hammerle,

I am writing in response to the above-referenced notice. Due to the potential for significant and long-lasting damage to Virginia's economy, including commercial fishing, tourism, its coastal environment and the local communities, I am opposed to any proposal for oil and gas exploration off Virginia's coast.

History demonstrates that failure during oil and gas extraction operations could result in significant, severe, and long lasting consequences. Given significant growth and development in alternate forms of energy, the risk of future exploration of oil and gas development off the coast of Virginia constitutes an unnecessary risk.

Two catastrophic failures prove the risk. The Exxon Valdez spill occurred in 1989, 28 years ago, with devastating effect. Alaska has yet to recover. The damage was such that Exxon spent over \$3.8 billion cleaning up, compensating 11,000 residents and paying fines. The herring and salmon fisheries have never fully recovered, leaving Alaska's commercial fishermen to suffer ongoing harm to their livelihood. Not only did the tourism industry immediately lose more than 26,000 jobs and more than \$2.4 billion in sales, it has never fully recovered because vacationers still think of the area as contaminated.

The 2010 Deepwater Horizon spill was even more devastating. The Gulf Coast region will not recover for decades. The cleanup cost BP \$61.6 billion. Moreover, perception overshadowed actual impacts: a quarter of people thought that leisure activities along the Gulf Coast were closed because of the spill when in fact this was not the case; the seafood industry

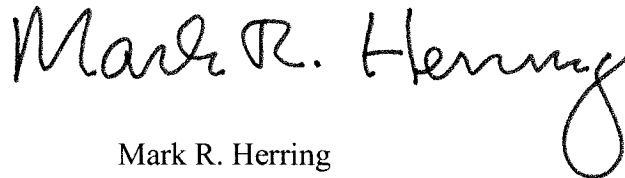
was particularly damaged because half of people surveyed thought that Louisiana oysters were unsafe to eat although evidence demonstrated otherwise.

The program under consideration poses great risk to Virginia's economy as it includes leasing portions of the Outer Continental Shelf from the southern tip of Florida to the northern tip of Maine for gas and oil development. As the Gulf Stream flows from southern Florida to the northern tip of Maine, spill or other incident along the East Coast south of Virginia may well impact Virginia. Virginia is the country's leading producer of hard clams and the East Coast's leading producer of oysters. Moreover, Virginia is the East Coast's largest producer of marine products with total landings of over 417,281,922 million pounds in 2015; the dockside value to watermen alone was \$199,499,690. Also, our coastal tourism supports 45,000 jobs and provides \$1 billion in salaries annually. Virginia does not desire to risk suffering a loss of economic opportunity or failing of our important natural resources. The federal government should not force this risk upon us.

As exemplified in formal actions by the on-going municipalities of Norfolk and Virginia Beach and the strong opposition by rural communities such as Accomack and Northampton, Virginians do not believe that oil and gas development off Virginia's coast is appropriate.

I appreciate the opportunity to provide BOEM with information and comment on this program and trust that once BOEM has considered this and other comments, it will conclude that the risk is too great to continue the development of this program.

Sincerely,

A handwritten signature in black ink that reads "Mark R. Herring". The signature is written in a cursive style with a large, looping "H" and a long tail on the "g".

Mark R. Herring