

October 9, 2002

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511

Attention: Code 2032 (Mr. Fred Pierson)

Dear Commander:

The North Carolina Chapter of The Wildlife Society (NCTWS) is an organization of over 200 wildlife professionals devoted to guiding and promoting the conservation and management of wildlife resources throughout North Carolina. Our Conservation Review Committee has reviewed the Draft Environmental Impact Statement (DEIS) for *The Introduction of F/A-18 (Super Hornet) Aircraft to the East Coast of the United States*. Based on our review, NCTWS provides the following comments concerning the preferred alternative Outlying Landing Field (OLF) locations identified in the DEIS:

Site C, Washington County, North Carolina

NCTWS urges the Department of Navy to remove alternative OLF Site C from further consideration.

Site C is located approximately 3 miles west of the Pocosin Lakes National Wildlife Refuge. The Refuge is owned and managed by the United States government for the conservation of fish, wildlife and plant resources for the benefit of the American public. The Refuge and surrounding (private) farmland are essential habitat for large flocks of tundra swans, Canada geese, snow geese, and shorebirds migrating on the Atlantic flyway.

Frequent, intense aircraft noise and movement through the airspace would negatively impact waterfowl and shorebirds by disrupting migration, feeding, and breeding activities. These types of disruption cause birds to expend more energy than they are able to gain, thereby decreasing birds' survival and diminishing the utility of Pocosin Lakes Refuge as habitat.

The concentration of large bird flocks near Site C raises a significant threat of bird-aircraft collisions. NCTWS believes that if Site C is selected, the Department of Navy will inevitably find it necessary to implement management practices that make habitat in the vicinity less attractive to birds and other wildlife. Such management practices will be part of the cumulative effects of the F/A-18, they will be in conflict with the federal investment in the Pocosin Lakes Refuge, and they have not been well addressed by the DEIS.

Site E, Craven County, North Carolina

The DEIS indicates that regulated wetlands may occur in the vicinity. This OLF site is located on a peninsula of land between the Pamlico and Neuse Rivers near their meeting with the Pamlico Sound. Impaired water quality and declining fishery resources are a paramount concern in all of these water bodies.

In order to prevent further degradation of water quality resulting from the OLF, the Navy should strive to avoid adverse impacts to wetlands, facilitate protection and restoration of natural wetland ecosystems, and demonstrate a commitment to environmental stewardship by utilizing the most effective options to treat wastewater and stormwater.

NCTWS recommends the Navy acquire permanent farming and silviculture conservation easements on all property located; outside the OLF complex, yet within the 60 DNL noise-contour. Such easements will benefit wildlife resources, discourage development of land-uses incompatible with military flight operations, and minimize socio-economic stress to local communities.

Acquisition of property title is also recommended, when necessary to obtain control of essential land-rights.

Any acquisition of any property-rights beyond the OLF complex boundaries should be carried out in consultation with the North Carolina Wildlife Resources Commission and the U.S. Fish & Wildlife Service to ensure that wildlife conservation and management are considerations.

Thank you for providing our organization this opportunity to comment on the development of your project. If NCTWS can be of any assistance to you, or provide further information concerning habitat or wildlife during the F/A-18 (Super Hornet) Environmental Impact Statement process please contact me.

Respectfully,

Pete Campbell
President
NCTWS