

A-017



PenderWatch & Conservancy

Post Office Box 662 Hampstead, North Carolina 28443

March 11, 2008

Naval Facilities Engineering Command, Atlantic
Attention: Code EV22 AFAST Project Manager
6506 Hampton Boulevard
Norfolk, VA 235 - 1278

AFAST DEIS

Ladies and Gentlemen:

PenderWatch & Conservancy wishes to submit these comments concerning the subject DEIS. PenderWatch is an all-volunteer organization representing 400 members in Pender County on the North Carolina coast. We describe ourselves as *"Responsible Advocates for the Environment."*

Comment Letters

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Section 1.4.2, Page 1-13 of the DEIS states that as-of December 16, 2006 you had received 131 letters in response to the 2006 public scoping meetings.

We respectfully request that you immediately post an image of those comment letters on the web with appropriate indexing by the name of the organization submitting the comment, or the name of the individual if the comment was by an individual. We request that you not wait for a Freedom of Information Act request to provide this information.
(1)

In response to a Freedom of Information Act request the Navy posted on the web 866 comment letters it received in November and December 2005 and in January 2006 concerning the proposed Undersea Warfare Training Range in Onslow Bight. We know that additional comment letters were sent within the comment period, but the Navy chose to post only 866 of them. Our reading of each of those comment letters revealed that 95% of the writers expressed opposition to the range or at least some level of concern with the lack of completeness of the DEIS.

We have not received any response from the Navy on those letters.



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At the November 14, 2006 public scoping meeting in Morehead, the Navy told us that the comments received by the Navy on the Undersea Warfare Training Range would also be considered as comments on this current DEIS. In comparing the numbers of letters the Navy purports to have received for the AFAST and USWTR projects - - 131 letters vs. 866-plus letters respectively, it is apparent that this has not been done.

We respectfully request that all comment letters issued concerning the Undersea Warfare Training Range be formally considered as a comment on this DEIS as well, as was agreed to by the Navy's representatives at the November 14, 2006 scoping meeting.

To so do would be consistent with what the Navy promised on November 14, 2006 and also within the spirit of the DEIS process. We recognize that some comments related to the Undersea Warfare Training Range, e.g., trenching for cables through hard bottom, are not relevant to this AFAST DEIS. However, many comments were about sonar in general, propeller cavitation, other ship noises, species harassment and disposal of toxic materials associated with sonar training exercises. Further, some of these USWTR comment letters were highly scientific in nature.

183 [Section 3.2.5, page 3-7 of the current DEIS states "*The Navy conducted internet searches using search Google, Yahoo and Dogpile ...*" We submit that the Navy should formally consider the comments in those 866-plus letters before engaging in general literature search.]

Thank you very much for considering these comments. We look forward to receiving your response.

Very truly yours,

James C. Milne

James C. Milne
President

had signed again

John R. Spruill

John R. Spruill
Vice President

(1) To the extent necessary, however, please treat this letter as a formal request, pursuant to the Freedom of Information Act, 5 U.S.C. par. 552, for all comment letters on the AFAST DEIS received by the U.S. Navy as of April 11, 2008.