

G-005



## ☒ North Carolina Wildlife Resources Commission ☒

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### MEMORANDUM

**TO:** Melba McGee, Environmental Coordinator  
Office of Legislative and Intergovernmental Affairs  
North Carolina Department of Environment and Natural Resources

**FROM:** Maria T. Dunn, Northeast Coastal Region Coordinator *Maria T. Dunn*  
Habitat Conservation Program

**DATE:** March 26, 2008

**SUBJECT:** Comments on US Navy Draft Environmental Impact Statement (EIS)/Overseas  
Environmental Impact Statement (OEIS), Atlantic Fleet  
Active Sonar Training (AFAST), Coastal North Carolina.  
**OLIA No. 08-0258**

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the subject application for impacts to wildlife and fishery resources. NCWRC submitted scoping comments (20 February 2006, Harris). Biologists attended a March 11, 2008 public hearing in Morehead City, NC regarding the proposed project. Our comments are provided in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et. seq.), and Sections 401 and 404 of the Clean Water Act (as amended).

The Department of the Navy (Navy) proposes to conduct the majority of Atlantic Fleet active sonar training along the East Coast and within the Gulf of Mexico. During training events, surface ships, submarines, and aircraft use a number of active and passive sonar systems, as well as other training devices for antisubmarine warfare (ASW), mine warfare (MIW), and related active sonar training.

The Navy has prepared an Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) for Atlantic Fleet Active Sonar Training (AFAST). The stated purpose of the proposed action is to provide mid- and high- frequency active sonar and improved extended echo ranging (IEER) system training for U.S. Navy Atlantic Fleet ship, submarine, and aircraft crews, to support the requirements of the Fleet Readiness Training Plan (FRTP) and stay proficient in ASW and MIW skills.

The NCWRC has reviewed the EIS/OEIS and has the following comments and concerns:

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**Mailing Address:** Division of Inland Fisheries • 1721 Mail Service Center • Raleigh, NC 27699-1721  
**Telephone:** (919) 707-0220 • **Fax:** (919) 707-0028

- 819 - [Section 3.10.4 incorrectly lists least terns as endangered. While the California and interior U.S. populations of least terns are listed as endangered, the Atlantic coastal population is not federally listed. It is, however, state listed in many states.] Least tern is listed as a Species of Concern in North Carolina and does deserve consideration in the section on the land side environment.
- 820 - [Bermuda petrels. The DEIS states "Since their species only nests on islets off Bermuda, the Carolina sightings are considered rare. This species is not expected to be encountered in the study area". According to the Draft Southeast United States Regional Waterbird Conservation Plan (Hunter, W., J. Collazo, B. Noffsinger, B. Winn, D. Allen, B. Harrington, M. Epstein and J. Saliva. 2005. U.S. Shorebird Conservation Plan, Southeastern Coastal Plains - Caribbean Regional Shorebird Plan, Version 1.0. U.S. Fish and Wildlife Service, Atlanta, GA.), "recent documentation provides evidence that foraging areas (for Bermuda petrels) include the Gulf Stream waters off of NC." It is our understanding that the Gulf Stream is at or adjacent to the proposed site so the presence of Bermuda petrels in the area shouldn't be ruled out.] Potential impacts include degradation of foraging habitat, night time collisions with lighted ships, risk of entanglement from debris such as discarded parachutes. Considering there are likely less than 100 Bermuda petrels, it is important to ensure that this species is adequately addressed in the EIS. Impacts to other high priority species such as Audubon's shearwaters and Black-capped petrels should also be addressed.
- 821 - [Seabirds and migratory birds. There is very little if any data on impacts of sonar on birds. We are concerned with impacts to seabirds and of greater concern, the potential impacts to prey resources through use of sonar and loss of hard bottom habitat.] As previously mentioned, collisions with lighted ships and encounters with discarded debris such as parachutes are also of concern.
- 823 - [We are concerned with the cumulative amounts of litter associated with the dispersal of materials for the proposed AFAST. Some yearly amounts include: 27,500 listening sonobuoys, 5,853 tonal sonobuoys, 872 explosive source sonobuoys, 308 receiver sonobuoys, 24 MK 46/54 torpedoes, 225 ADCs, and 725 EMATTS. In addition, it is extremely difficult to understand the cumulative impacts of the multiple releases of various hazardous materials on the marine environment. While there is discussion of releases of hazardous material from individual sources, there is little discussion of cumulative impacts from multiple sources over many years.]
- 825 - [The preferred alternative is stated to be the "No Action" alternative. This alternative was chosen based on the flexibility of training, lesser cost, and geographical variation for naval training, not avoidance of impacts to marine resources. We are concerned with the potential to impact important marine resource areas including impacts to National Marine Sanctuaries, migration routes, and important seasonal activities of marine resources.]

G-005

826

- Section 4.11. [The first two paragraphs in this section are conflicting. The initial paragraph states neither the No Action Alternative, Alternative 1, Alternative 2, nor Alternative 3 will allow sonar activities in specifically listed National Marine Sanctuaries. However, the following paragraph states the No Action Alternative could conduct activities in these sanctuaries, but at the present time does not.]
- ✓ - [We have coordinated with the NC DMF with regard to fisheries resources in the area and share their concerns with the impacts of the project on hardbottom (aka live-bottom) habitat and fisheries, particularly those that provide foraging resources for birds, sea turtles, and marine mammals. We support their recommendations in this regard.]
- We defer comment on marine mammals to the National Marine Fisheries Service (NMFS).

We appreciate the opportunity to be involved with the review of the Draft EIS/OEIS. If you have further comments or questions, please call me at (252) 948-3916.