

August 8, 2003

Mr. Fred Pierson
Atlantic Division, Naval Facilities Engineering Command
Code BD32FP
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Re: Outlying Landing Field proposed by the U.S. Navy in eastern North Carolina

Dear Mr. Pierson:

We have reviewed the Final Environmental Impact Statement (FEIS) for the Introduction of F/A-18 E/F (Super Hornet) Aircraft to the East Coast of the United States. In particular, we are concerned with the selected location for placement of an Outlying Landing Field (OLF) in eastern North Carolina. Admiral Robert J. Natter, Commander U.S. Atlantic Fleet, has recommended that the Navy locate the OLF at Site C in Washington County, North Carolina. We urge the Navy to reject the Washington County site and to consider locating the OLF at an alternate site.

As identified in the FEIS, the Navy's acquisition strategy is to purchase 30,000 acres surrounding the 2,000-acre core area in "order to promote compatible development and land use near the OLF." This acreage would be managed in such a way as to minimize attraction to large numbers of waterfowl. Such management would take major acreage of foraging habitat from the coastal landscape at a time when state and Federal agencies and non-governmental organizations such as Ducks Unlimited are working diligently to add to that foraging base. Foraging habitat expansion is an effort to meet current and future needs of Atlantic Flyway populations of waterfowl.

The coastal counties of east-central and northeastern North Carolina constitute a core habitat for wintering populations of migratory waterfowl of eastern North America. In this regard, this region is second in importance only to the Chesapeake Bay region to the immediate North. Nearly a million waterfowl (swans, geese and ducks) winter in this region in most years, with most arriving in significant numbers in early November and remaining through mid-March. Non-migratory Canada geese and resident wood ducks utilize the region year-round. Natural lakes and managed wetland habitats, coupled with winter grain and fallow agricultural fields (many shallowly flooded for the benefit of waterfowl) provide a high percentage of foraging and resting habitat utilized by these birds.

As stated in our Draft EIS response, we reject locating an OLF at Site C for two main reasons as related to Ducks Unlimited's mission:

- (1) Lands in the footprint of the proposed OLF contain important waterfowl habitat; and
- (2) The noise signature of the Super Hornet aircraft during touch-and-go landing routines would, undoubtedly, be disruptive to the large numbers of waterfowl that currently utilize these areas.

While the above concerns apply to Site C in particular, locating the OLF in any of the Sites A through D would be problematic. Waterfowl habitat in and around these areas is among the best on the Atlantic Flyway. It attracts and holds large numbers of waterfowl and is key to continued health of Atlantic Flyway waterfowl populations. The daily activity patterns of thousands of waterfowl combined with the disruptive nature of training procedures significantly increases the collision threat to pilots and their aircraft.

In summary, our position is consistent with other professional resource experts including the U.S. Fish and Wildlife Service, North Carolina Wildlife Resources Commission, The Audubon Society, The Nature Conservancy, and the Atlantic Flyway Council. We urge the Navy to reject Site C in Washington County because the wetlands and the waterfowl they attract are of local, national and international importance.

Thank you for providing the opportunity to participate in this site selection process.

Sincerely,

A handwritten signature in black ink that reads "Kenneth M. Babcock". The signature is written in a cursive, slightly slanted style.

Kenneth M. Babcock
Director