

Audubon North Carolina

November 16, 2005

Mr. Keith Jenkins  
Code EV21KJ  
Naval Facilities Engineering Command, Atlantic  
6505 Hampton Boulevard  
Norfolk, VA 23508 1278

**October 2005 Draft EIS for Proposed Onslow Bight Sonar Range**

Dear Mr. Jenkins:

Thank you for this opportunity to comment on the Onslow Bight Sonar Range. As a coastal ecologist, I am concerned that an objective data assessment has been conducted to provide a clear picture of the ecologic and consequently, economic harm this project may pose for the natural offshore and coastal communities that make up the Onslow Bight.

This letter serves as my request that an EIS be conducted to assess the area's use by marine organisms including bony fishes, Elasmobranchs (sharks, skates and rays), and air-breathing marine vertebrates (sea turtles, pelagic birds, and marine mammals). Considerable peer-reviewed literature suggests that the Onslow Bight is an important year-round environment for a wealth of marine life, as evidenced by the fact that this area is home to an important and economically viable fishing industry; an industry that includes both commercial fishing for market and recreational fishing that generates millions of dollars for coastal communities that depend on tourism for their sustainable economic future.

I trust an EIS will look into both the economic impacts as well as the ecological impacts of this proposed sonar range because the former depends upon the health and well-being of the latter.

My concerns about this proposed sonar range should not be interpreted as being a "not in my backyard" outcry. Rather, I am concerned that this proposed sonar range is in the ecologically wrong location as well as logistically wrong location, from an economic standpoint as well as national security standpoint. That said, I ask the Navy to look at other sites that might be more real world in terms of interdicting threats to our nation's security.

An alternate site is the New York Bight, an area that has been polluted from decades of offshore garbage dumping and considered by many marine ecologists as "dead", though a

better term would be “dangerously contaminated”. The New York Bight is located in an area that is a much more likely target for enemies of our nation than, by comparison, the relatively placid coast of North Carolina.

Another site I would suggest is the offshore region of the Mississippi River in the Gulf of Mexico. This zone is highly contaminated from decades of industrial and agricultural chemicals (including pesticides and heavy metals) carried in the waters of the Mississippi River and deposited in a large and fairly concentrated area of the Gulf.

From an ecological perspective, if the Sonar Range does actually cause marine organisms to alter migration routes or abandon areas altogether, locating the Sonar Range in either of these alternative sites will have the serendipitous benefit of flushing animals from an otherwise harmful environment in the first place.

As we plot a course to secure our nation from human-based threats, whether from organized terrorists or sovereign nations, we need to exercise caution so we do not intentionally or inadvertently harm our high quality standard of living in the process. North Carolina’s coastal economy can only be sustained if the natural resources that support it are protected from harm, including fisheries that might be adversely impacted by dangerously loud underwater sonic noise.

In closing, I ask that you examine the potential economic and the ecologic impacts this proposed Sonar range might have on our coastal economy, and provide State officials and interested parties with a vetted (and independent) needs assessment of the real world threats this Sonar Range is supposed to protect us from.

Respectfully yours,

Andy Wood  
Education Director