

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

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Daniel T. Furlong
Executive Director

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Naval Facilities Engineering Command, Atlantic
Attn: Code EV21 (Atlantic Fleet Sonar PM)
6506 Hampton Blvd.
Norfolk, VA 23508-1278

Dear Sirs,

The Mid-Atlantic Fishery Management Council has a number of concerns regarding the proposal by the Navy to establish an Undersea Warfare Training Range (UWTR) adjacent to the Atlantic Coast of the United States. Under the authority of the Magnuson-Stevens Fishery Conservation and Management Act, the Mid-Atlantic Council has management jurisdiction for fishery resources in federal waters which occur primarily from New York to North Carolina. However, the geographic range of a number of the species that the Council manages extends along the entire east coast of the US, so we are concerned about possible negative effects on the marine resources which exist in both the Mid-Atlantic and South Atlantic Bights.

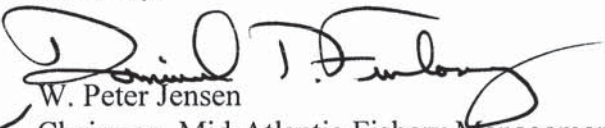
The Council's principal concern relates to the potential negative effects of the construction and operation of a mid-frequency sonar training range on the large marine ecosystems in the area of concern (i.e., ocean waters which extend from the Chesapeake Bay southward to the coast of Florida). These concerns are based on the general lack of knowledge about the short or long term effects of the use of mid-range sonar on fish and marine mammals which inhabit the proposed training areas. Very little is known about the general effects of sound on fish behavior and in particular the effect of exposure to mid-range sonar. While more information exists about the effects of sonar on marine mammals, a general paucity of data exists relative to this important component of the marine ecosystem as well. The Council recommends that the Navy continue to explore available scientific literature and conduct scientific research on these subjects so as to minimize any adverse effects to these important marine populations. In addition, the Navy should initiate and operate monitoring programs to determine the extent of effects of the proposed training activities on fish and marine mammal populations.

Our next area of concern relates to the possible negative effects that the construction of the proposed training ranges could have on the physical integrity of fish habitat in the area. Both the Mid-Atlantic and South Atlantic Councils have designated Essential Fish Habitat in numerous fishery management plans for species which overlap all three of the proposed training sites. Of particular concern are hard bottom areas (i.e., those with structured features) which could be negatively impacted during the construction phase of the proposed project. The Navy should consider this habitat information during the planning and construction phase of the proposed project to help minimize any negative physical effects to essential fish habitat.

Our final area of concern regarding the construction and operation of an UWTR relates to the possible disruption of recreational and commercial fishing activities in the proposed areas. Numerous commercial and recreational fisheries under our jurisdiction occur in the proposed UWTR sites. Commercial fisheries of concern include those which use mobile bottom tending gears such as otter trawls or scallop dredges which could potentially interact with exposed UWTR hardware placed permanently on the ocean floor. We are also concerned about physical access by the public to the fishing grounds in the proposed UWTR areas during both construction and training exercise portions of the project. All six fishery management plans developed and administered by the Council contain a temporal and spatial description of the location of fishing activities for each fishery. This information should be examined to help minimize any disruption of fishing activities which occur in the proposed UWTR areas.

The Mid-Atlantic Council recognizes the need for a strong national defense and the important role that field training of our naval forces plays in this regard. The Council appreciates the opportunity to comment on the proposed UWTR project and understands that there are many complex issues which must be addressed by the Navy in the development of such a large scale training exercise in the open ocean. The fundamental questions about the ecological effects of the construction and operation of the proposed UWTR are difficult to address given the general lack of scientific data in this area. Nonetheless, the Mid-Atlantic Council stands ready to assist the Navy in the development of this project in a manner that meets your objectives and avoids or minimizes any ecological impacts on the marine resources for which we have management authority.

Sincerely,



W. Peter Jensen
Chairman, Mid-Atlantic Fishery Management Council

WPJ/RJS

cc: Robert Mahood
NMFS HQ, Office of Protected Resources