



October 24, 2008

Reply to Attn of: 800

Code EV22LL (USWTR OEIS/EIS PM)
Naval Facilities Engineering Command Atlantic
6506 Hampton Boulevard
Norfolk, VA 23508-1278

Subject: Environmental Impact Statement (EIS) for the Undersea Warfare
Training Range (USWTR)

As I have stated in two previous letters, there will be unacceptable impact to NASA's Wallops Flight Facility if the USWTR is placed off the Virginia Eastern Shore Coast in Warning Area W-386 (Site D). In accordance with your procedures, I have sent letters to your organization communicating unacceptable impact on January 25, 2005, and on February 22, 2006. My staff and I have attended several meetings with your personnel, privately and in public. I am dismayed that I must continue to communicate to correct the EIS.

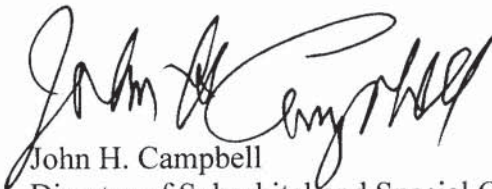
In response to the U.S. Navy's recent USWTR EIS notice, dated September 12, 2008, I would like to renew our objection to your consideration of Site D. As we have communicated and as acknowledged in your EIS, the Virginia Capes Operating Areas (VACAPES) is a critical and heavily used flight operations area that is core to the missions of NASA's Wallops Flight Facility (WFF) and our tenants. Our ability to have regular and reliable access to these waters and airspace for hazardous rocket and aircraft operations is essential to our ability to execute critical NASA, Department of Defense, and commercial programs, and our inability to do so would not only threaten these missions but also the sustainability of WFF as a national resource responsible for supporting national priority programs.

NASA's WFF is currently already challenged in our ability to meet schedule needs for our projects due to the high volume of existing Navy and U.S. Air Force operations in the VACAPES, and because of NASA's lower scheduling priority. For many of our flight operations, we may often only be able to get required VACAPES areas in the late night/early morning hours. In Section 4.4.1.4 of the EIS, the Navy asserts that NASA has overstated the impacts that an additional 80-130 days of USWTR operations might cause because some of the days in question would have inclement weather, unsuitable for flight operations. NASA, in fact, often launches both rockets and piloted/unpiloted aircraft for the purpose of studying weather phenomena, including inclement weather.

The Navy, in Section 4.8.10, incorrectly asserts that “no major launches are planned for Wallops Flight Facility/Goddard Space Flight Center.” NASA’s WFF continues to average one major rocket launch per month in addition to weekly sorties of uninhabited aerial systems, each using the VACAPES Operating Areas. Since our last correspondence, Wallops has been assigned responsibility for conducting launch demonstrations of critical technologies supporting NASA’s Exploration program that will return humans to the Moon, as well as the launch of lunar orbiting spacecraft supporting NASA’s Science Mission Directorate. Wallops has also been designated as the launch site for the new Taurus II expendable launch vehicle which is planned as a primary means for resupplying the International Space Station. This vehicle will add at least four additional major launches per year to the existing Wallops launch manifest. For these major missions, launch delays cost our programs hundreds of thousands of dollars per day.

As we have stated in the past, were the Navy to adjust Site D northward such that its location was not in direct conflict with the hazard areas of Wallops flight operations, we would have no objections with the Navy’s USWTR plans. Without such adjustment, however, we remain convinced that USWTR plans in the VACAPES are incompatible with long standing operations conducted by WFF, and we remain adamantly opposed to the establishment of the USWTR at this site.

If it would help to save Government resources expended in these recurring communications, we would gladly rewrite Sections 4.4.1.4 and 4.8.3.10 to ensure their accuracy.



John H. Campbell
Director of Suborbital and Special Orbital Projects

cc:
200/Ms. Massey
800/Mr. Purdy
802/Mr. Underwood
840/Mr. Pittman