

Sunday, January 20, 2013

Dear Mr. Bonetti,

The Town of Slaughter Beach sees no silver lining in this final CCP. It still contains so many undetermined variables which continue to have such an adverse impact on our 331 year old community and region, leaving our futures uncertain. A good neighbor Prime Hook National Wildlife Refuge (PHNWR) is not! Our Bayshore Region is in jeopardy because of Fish and Wildlife and its practices. Prime Hook Community is a prime example of what impact PHNWR has on her neighbors, along with all the flooded lands within and surrounding PHNWR.

The thing of paramount importance to PHNWR's neighbors and the Bayshore Region is still unclear and uncertain- **FIXING THE BREACHES, STOPPING THE FLOODING, and SAVING THE HABITATS!** We learned firsthand from Scott Kahan (Regional Chief) that now 5 years later there is still no definite plan or ACTION, but only more studies, and colossal uncertainties ahead of us.

It is stated in this final draft, of the refuge purposes and promises made 50 years ago (1963) - "It's a well intentional statement in the context of incomplete knowledge and the very human inability to foresee the future." (Pg. M-12). We ask what has changed, will they not be saying the same thing 50 years or less from now! It is further stated on pg. M-71 "The service determined the dune repairs were not an emergency, and that NEPA review should be conducted prior to restoring the marsh system including the dunes."

The Town of Slaughter Beach, Prime Hook Beach, Broadkill Beach, surrounding farmers, and landowners would all certainly and adamantly disagree. We trust also that all the destruction and devastation in the meantime to the environment, habitat, and region support our position.

We additionally think 30 days to review and to comment on such a large in-depth final draft is unrealistic and unfair. Furthermore, I kind of think it is pointless. As today, we the Bayshore Region are in no better of a position than we were when this started as far as Fish & Wildlife is concerned, in fact worse, as conditions have worsened. Nor do we now have any more concrete answers, or certainty of our Bayshore Regions future from you!!! Attached to this letter is a list titled- Specific Comments, with some of our greatest concerns at this time, found with the limited resources and time available to small towns & communities such as ourselves.

This CCP system like so many others in our country- is broken. How over 900,000 dollars and 8 years can be spent in the process- while our region is being destroyed including our once revered PHNWR, is incomprehensible.

We will continue to be a good neighbor and leader in our region, including to PHNWR. Especially considering PHNWR not only borders our town but its northeast corner lies within our town. We do feel though that PHNWR must start to be a good neighbor and respect our Bayshore region and take responsibility for its adverse actions therein!!!! How- by **FIXING THE BREACHES, STOPPING THE FLOODING, AND SAVING THE HABITAT, for starters!!!**

Sincerely,

Amy J. Reed Parker

Mayor, Slaughter Beach

“Nothing changes unless you make it change.” unknown

**Specific Comments:**

1)Pg. M-58 – “We do not intend filling the breaches unless, and until, we determine that such a step would support either salt marsh restoration or comprehensive marsh restoration. We will base our decision on hydrodynamic modeling that is underway and by further consultation with the State and wetland corp.”

**Our response:** This is totally unacceptable on so many levels and so many years later. Especially since the more public perception being portrayed is that there is a better probability now that it will happen. Our joint opinion has been well documented on fixing the breaches.

2) Pg. M-47–“We will still need to complete an additional EIS that evaluates the use of this dredge material and assesses the impacts of marsh restoration to comply with NEPA.”

**Our response:** The fact that an EIS will still be needed to be done to fill the breach is inexcusable and negligent. It should have been started, & long underway.

3) Pg. M-53- “It is unclear at this time whether or not the State or landowners north of the refuge will install flap gates or take measures to reduce the flow and salt water intrusion via Slaughter Canal, but, as explained elsewhere, the most sustainable approach to reducing flood impacts on surrounding uplands is a robust salt marsh in Unit II.”

**Our response:** Water from where, the breach on PHNWR land! Yet those affected at their expense are to take measures to stop it. At the expense of whom- the damaged neighbors! “The most sustainable approach” is in your opinion. Ours is to fix the breach, stop the daily flooding!

4) Pg. M-49 “In order to prevent this from occurring, landowners may need to install flood control devices in the future. Such adaptations have been necessary on coastal agricultural land elsewhere.”

**Our response:** Once again a neighboring land owner at his expense must fix something that is a result of practices on PHNWR land. This is a prime example why PHNWR is not respected by its neighbors. The Farmland Preservation Act works to save farms while F&W through aspects of its management & direction at this critical time are instrumental in causing great damage to them. Additionally, you use the argument that such adaptations (flood control devices) are necessary elsewhere, if that argument is fair from one side it to must be fair from the other! PHNWR’s flood waters are flooding ALL us.

5) Pg. M-49- “This past spring, we expanded an informal advisory partnership with numerous academic professional and representatives of other agencies to include representatives of the Alliance for Bay Beach Communities (ABC), the Prime Hook Beach Organization (PHBO), and local farming community.”

**Our response:** Slaughter Beach would like a seat at that table. We respectfully request to be included, as the one incorporated Town in this region, of which PHNWR is a landowner in, and one equally affected, we feel it is warranted.

6) Pg. M-55- Comment- “The State of Delaware stated that the continued breach in the dunes is contrary to the letter of February 20, 1963 by the then Department of Interior Secretary.”

Your response: “We respectfully disagree.”

**Our response:** We respectfully disagree with you!

7) Pg. C 67-70- The maps showing all the different hunting options. Most free roaming.

**Our response:** A large part of our Town will now be surrounded by active hunting areas most months (8+) of the year, especially our southern end of Town. This is not acceptable, safe, and one would hope not legal. It appears your boundary lines of open hunting zones meet our southern border, in other words abutting residences. Additionally, you state that the beaches within PHNWR are public and only Prime Hook Community has a private beach. Yet with these proposed hunting areas you are endangering not only the residents of Slaughter Beach but the public at large as the hunting areas go to the beach line or farther where many folks take long strolls on the beach within PHNWR. Will these beaches

become closed or not open to the public for recreational beach walking? Will extra signage or fence barriers be erected to protect our citizens? How far does shot travel? Who will police this, as it will be necessary so close to a Town? What is the legal hunting distance from a residence, community, & public beach? What do we tell our residents, how is this explained. **As no other community has hunting in such close proximity to their community or to a public beach** which is so highly used for daily recreational walking! Additionally as an active participant in "The Bayshore Initiative" which promotes outdoor recreation, we find this totally unacceptable & very irresponsible on F&W part. It was understood PHNWR was to be a partner in The Bayshore Initiative, is this what can be expected!!! Endangering lives &/or closing off beautiful expansive beaches for walking!

8) Pg. M-76- Mosquito Control-

**Our response:** we rely on our resident Jackson Gingrich Ph.D. to speak to that issue separately.\_

**Note:**

This proposed final CCP is regarded by most unfavorably, many will not respond as they feel the fight was lost before it was started and that F&W long ago set the path of destruction and will not veer. We the Town of Slaughter Beach have responded though we see little positive actions thus far, more words, and many of them not reassuring or proactive to our region and its environments. A simple ride or walk about proves that fact. Our eyes see the decline and destruction, and devastating flooding, our ears hear less sounds of wildlife, our hearts feel the pain of a beautiful resource being allowed to decay and self-destruction at the hands of those (F&W) charged with its protection. We the surrounding REGION suffer as a result! We are in jeopardy because of F&W, not Mother Nature!!! For all around us & the world the effects of Mother Nature are dealt with, only here in our region within PHNWR are they allowed to fester so & escalate and blatantly affect so many innocent neighbors thereof negatively! Why's that?

We hope the efforts of our Governor Jack Markell, local Senator Gary Simpson, Representative Harvey Kenton, Sussex County Councilwoman Joan Deaver, U. S. Senators Carper & Coons, Representative Carney, Dept. of Agriculture (Ed Kee), DNREC (Collin O'Mara), DelDot (Shailen Bhatt), Alliance of Bay Communities, community leaders, & others **all work together** to ensure Fish & Wildlife and Prime Hook National Wildlife Refuge finally quits devastating our Bayshore region & state! The scope of what is happening on your lands and spilling out to the region is truly unbelievable and certainly should be STOPPED now!