

June 26, 2012

Chief of Naval Operations (N45)
2000 Navy Pentagon
Room 2E258
Washington, DC 20350

RE: Draft EISs/OEISs for Training and Testing Activities

I have read that the Navy is moving full speed ahead with plans for sonar and explosives training that threaten to deafen, injure, and even kill countless whales, dolphins and other marine mammals. Starting in 2014, the Navy will harass, injure, or kill marine mammals more than 33 million times in both the Atlantic and Pacific Oceans during five years of testing and training with sonar and explosives. Those alarming numbers come from the Navy itself.

I am writing to ask your help because I am deeply concerned at the Navy's estimates of the far-reaching harm that will be inflicted on marine mammals during proposed training and testing activities off the coasts of Hawaii, Southern California, the Atlantic seaboard, and the Gulf States from 2014 to 2019, as stated in your Draft Environmental Impact Statements.

The sheer scope of the Navy's proposed training and testing activities is staggering, potentially assaulting entire populations of marine wildlife off the East Coast, Southern California, Hawaii and the Gulf states. Navy ships will flood millions of square miles of ocean with high-intensity sonar, which is known to cause disorientation, hearing loss, stranding and death in whales. In addition, the Navy will be detonating high-powered explosives with the potential to fatally injure the lungs and other organs of marine mammals.

The projected damage to whales and dolphins is staggering, with 33 million instances of "take" over five years, a vast increase over existing estimates of harm for the same regions.

I am shocked by the level of carnage reflected in these numbers: over 5 million instances of temporary hearing loss; 16,000 instances of permanent hearing loss; almost 9,000 lung injuries; and over 1,800 deaths.

The analysis fails to present and analyze reasonable alternatives that would significantly reduce the unprecedented level of harm to marine life. The mitigation scheme that the Navy principally relies upon, centered on the ability of lookouts to detect whales and dolphins, will not result in an appreciable decrease in marine mammal injuries.

Federal courts have found this same scheme inadequate and ineffective for good reason: it is largely useless in conditions (common at sea) that impair visual surveillance, it is unsuitable for detecting cryptic and deep-diving species that spend little time at the surface and, even if it were fully effective at detecting whales and dolphins, would only protect species from the most serious injuries.

The waters around Hawaii and Southern California, including critical habitat for endangered blue and humpback whales, would be among the hardest hit. The Navy predicts that more than 1,000 marine mammals would be killed in this area alone.

And the threat to even one North Atlantic right whale may be one too many, as fewer than 400 of these survivors now hover on the brink of extinction.

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I urgently and respectfully call on the Navy to identify and set aside areas of high marine mammal density acknowledged to be the most effective means of reducing marine mammal injury. The Navy should and must take common sense precautions -- like keeping training out of key whale habitat -- before launching this sonic assault. Such precautions will not compromise the nation's military readiness.

I urgently and respectfully ask the Navy to enact tough safeguards for marine mammals before it conducts the next five years of training exercises.

If the Navy wishes to be seen as an effective steward of the ocean environment, it must take steps to significantly reduce the level of harm that training and testing activities will inflict on marine life.

Thank you for the opportunity to comment and for your help on behalf of marine life.

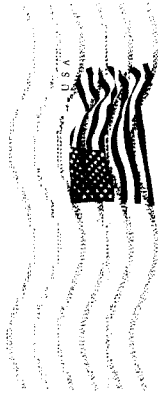
Yours truly



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