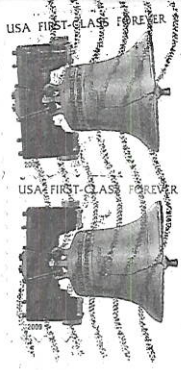




Ms. Nina Monasentich
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 30 JUL 2012 PM 2:1

Naval Facilities Engineering Command, Southwest
 Attn: HSTT EIS/OEIS Project Manager
 ER21 CS 1220 Pacific Highway
 Building I, Floor 3
 San Diego, CA 92132-5190

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Naval Facilities Engineering Command, Southwest
Attention: HSTT EIS/OEIS Project Manager – EV21.CS
1220 Pacific Highway, Building 1, Floor 3
San Diego, CA 92132-5190

July 10, 2012

Re: Draft Environmental Impact Statement Overseas Environmental Impact Statement for Hawaii-Southern California Training and Testing

To Whom it may concern:

There are many serious problems and omissions to this DEIS. Here are a few of the problems:

In my testimony dated September 12, 2010 I asked for the following to be included in the DEIS:

In relation Sonar impact on cetaceans I pointed out that the likely cause of mass strandings are panic, bubble formation and/or decompression sickness (based on real scientific published papers):

- 1) Sonar caused panic reactions leading to strandings followed by death
- 2) Sonar caused decompression sickness (the bends) followed by death
- 3) The bends caused by sonar even in the absence of panic

These three points were either not included or not addressed in a scientifically relevant matter.

In addition I asked for seven specific scientific papers to be included in the EIS analysis, and for the information to be researched and published by NON-Navy scientists and contractors. Only two of the seven were actually included in this EIS. So again, you must include the following five papers and the data should be researched and analyzed by NON-Navy scientists and contractors:

Reputable organizations have noted several reasons why expanding the safety zone would reduce the risk of near-array exposures: for example, (1) marine mammal groups are often spread out over a wide area, and animals may go undetected within the safety zone even if group members are only spotted outside; and (2) uncertainty remains over the thresholds and distances needed to cause hearing loss in some species. Given the Navy's *de facto* use of a wider safety zone in past exercises, it should consider how to provide for safety zone enhancements outside critical points of its training.

In addition, the Marine Mammal Commission has repeatedly called for modifications in the safety zone provisions to allow sufficient time for animals to move out of the sound field.

Hawaii is very different from other areas. The EIS needs to identify areas where the species are for each island.

In the DIES the Navy also fails to include data from the July 2004 Hanalei Bay event, in which 150-200 melon-headed whales were embayed for more than 24 hours during the Navy's Rim of the Pacific exercise. According to the Navy's analysis, predicted mean received levels (from mid-frequency sonar) inside and at the mouth of Hanalei Bay ranged from 137.9 dB to 149.2 dB. The Navy has from the beginning denied any connection between its major international exercise and the mass stranding. However, the Navy's specious reasoning is at odds with the stranding behavior observed during the event and with NMFS' report on the matter, which ruled out every other known potential factor and concluded that sonar was the "plausible if not likely" cause. The Navy's failure to incorporate these numbers into its methodology as another data set is unjustifiable.

On October 28, 2004 the European Parliament passed a resolution that is probably one of the strongest statements by an international body yet on the issue of military sonar and its impact on cetaceans. This resolution called on the European Commission and the Member States to: "adopt a moratorium on the deployment of high-intensity active naval sonars until a global assessment of their cumulative environmental impact on marine mammals, fish and other marine life has been completed"; and "immediately restrict the use of high-intensity active naval sonars in waters falling under their jurisdiction"; as well as to "set up a Multinational Task Force to develop international agreements regulating noise levels in the world's oceans, with a view to regulating and limiting the adverse impact of anthropogenic

sonars on marine mammals and fish.” (European Commission, 2004)

Indeed, the greatest user of military sonars in the world, the US Navy, appears to be in denial about the situation and dismissive of the concerns of the majority of the population and other nations.

And the most shocking part of the document is the “justification” for the NOAA Marine Fisheries “take” permit to harm and kill endangered marine mammals more than 33 million times during five years of testing and training with sonar and explosives. Including more than five million instances of temporary hearing loss, 16,000 instances of permanent hearing loss (since no one involved in this DEIS seems to understand science, here is an important fact: a deaf cetacean is a dead cetacean), almost 9,000 lung injuries, and more than 1,800 deaths.

These numbers are unconscionable and unacceptable!

So, again, your “science” in the DEIS is severely flawed and inadequate! I request this DEIS be re-done by non-Navy professionals.

If you have any questions, please contact me.

For the whales and healthy Oceans,
Sincerely,



Nina Monasevitch