

COMMENTS ON U.S. NAVY HSTT DEIS 6/15/12

Aloha, my name is Dave Raney, and I am Team Leader of the Sierra Club's National Marine Action Team. The Sierra Club is soliciting comments from our affected Chapters and will submit written comments on this DEIS, and the Atlantic Fleet Training and Testing DEIS.

This evening I will make a few preliminary comments.

First, we recognize and appreciate the contributions of our armed services personnel, including the U.S. Navy, in providing for the security of our homeland under increasingly complex conditions. That includes the difficult task of seeking to balance the duties of providing such security while also fulfilling their responsibilities as environmental stewards. We value our freedom and security. As Pacific Islanders in particular, we also value our relationships with whales, dolphins, sea turtles, sea birds, and other creatures with which we share the Planet. They are more than just "natural resources" and we ask your help in protecting them from risks your training and testing activities may pose, as they also face increasing stresses in coming years from climate change impacts -- including rises in sea levels, and increases in sea temperatures and ocean acidification.

You have invited our help in improving this DEIS. Here are two suggestions:

1. **Use coastal and marine spatial planning tools, as promoted by the National Ocean Policy, to address the conflicts this DEIS attempts to address.** NOAA and the Navy have a broad array of applicable tools, including a geographic information system data base showing the densities of marine mammal and sea turtle species found in specific areas. Avoiding areas of high population densities through the use of spatial planning, or zones, such as the National Marine Fisheries service proposed monk seal critical habitat, would be much more effective than the heavy reliance the DEIS currently places on the use of lookouts and limited area mitigation zones
2. **Abandon the SINKEX program of sinking obsolete ships in our waters.** We note that each of the three alternatives includes the possible sinking of up to six ship hulks in the Hawai'i Range Complex through use of the SINKEX project. We urge the Navy to abandon the wasteful and environmentally threatening practice of sinking ships that still contain remnant amounts of PCBs even after meeting what we consider to be inadequate cleanup standards required by the EPA. This DEIS rules out several potential mitigation measures because they would make a training practice "unrealistic." The use of SINKEX involves sinking a large, unarmed, stationary vessel incapable of attempting evasive maneuvers or employing electronic countermeasures. This fails the requirement for realism, just as shooting a grazing cow would not adequately prepare one for duck hunting. SINKEX has provided a small percentage of trainees the experience of watching live weapons send very large ships to the bottom of the ocean. That experience passes with time, while the ship that was sunk permanently joins what has become the underwater equivalent of an elephant's graveyard on our seabed. There are more than a dozen such ships sunk within the Hawai'i Range Complex, most of them due north of the island of Kaua'i. Surely this is not an acceptable environmental legacy for the Navy, and we urge that you abandon the use of SINKEX from this time forward.

Mahalo.