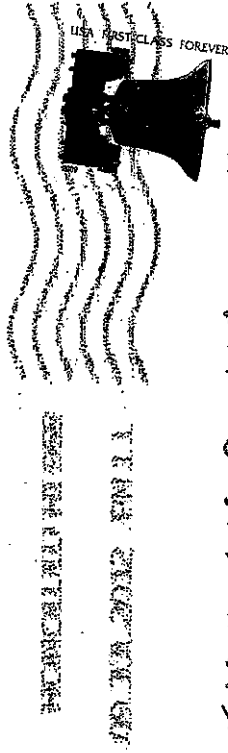


SURFRIDER FOUNDATION  
PO BOX 819  
WAIMANU, HI 96796



NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC COAST HWY, BLDG 1, FLOOR 3  
San Diego, CA 92132-5190

coln HSTT EIS JOES ~~Project Manager~~ EIS/211/CS

***Surfrider Foundation***

PO Box 819  
Waimea, HI 96796

**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

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

July

Dear Navy Consultants,

The Surfrider Foundation, Kaua'i chapter, wishes to submit comments on the Navy's Draft Environmental Impact Statement/ Overseas Environmental Impact Statement ("DEIS") for its training and testing activities in Hawaii and Southern California. *See 77 Fed. Reg. 27771 (May 11, 2012); 77 Fed. Reg. 29636 (May 18, 2012).* Please include these comments in the administrative record.

Our chapter of the Surfrider Foundation was a plaintiff in the lawsuit against the 2006 RIMPAC exercises that forced the Navy to comply with the law and write this EIS. This EIS represents some progress and for that we are pleased.

However, the content of this document, even though it is extremely long and claims to cover every single training activity that the Navy might do in the next five years, says very little, indeed.

First, NEPA requires that each individual federal activity that is to have a significant environmental impact have its own environmental analysis. Our view is that a document that covers "everything that we might do in the next five years" does not meet the standards of the law. A good example is this year's RIMPAC exercises that are going on now. The Navy is, through the DARPA program, testing laser weaponry and laser "communication." Where is the EIS for that? The entire RIMPAC exercise needs its own separate environmental analysis.

The US Navy is, arguably, the most destructive force in the entire ocean and this EIS claims to cover every thing the Navy does vis a vis "training." This is absurd. Each destructive activity needs its own environmental analysis.

The main point of the document which comes through over and over again in every section is "We are the Navy, what we do is important. We have to train our troops for a Naval attack and we are not going to change anything we do. We are not going to even

try to mitigate our harms. The best we can do is station a few sailors on the bow to scour the horizon for endangered marine mammals.” Posting a watchperson while blasting through the ocean is not mitigation.

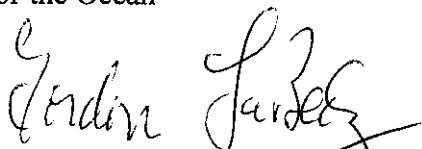
The most arrogant section of the document lists all the things that are left out of the document and that will not be changed because training sailors to make war is so important and that this training trumps environmental laws and common decency.

The sections on active sonar are contradictory, some saying that there can be no mitigation, others saying that sonar is harmless and still others saying that when the sailor-watchmen see whales within a hundred yards they will turn down the volume of the sound blast. It would look better if all the consultants agreed, but it appears that all are the consultants are apologists for their employer and that none of them care much for the established science around active sonar and its harms. Active sonar sound blasting has even been shown to harm coral reefs!

The weakest part of the document is the “justification” for the NOAA Marine Fisheries “take” permit to harm and kill endangered marine mammals. There is simply no science whatsoever to justify the numbers. Killing endangered species, arguably, is one of the worst things the Navy does besides burning fuel and polluting the ocean and yet there is no justification, nor science for NOAA to make any educated decision.

Years ago, the Navy would not hire consultants and did whatever they want. Now they hire consultants and continue the same destructive behavior without mitigations.

For the Ocean

A handwritten signature in black ink, appearing to read "Gordon Lurie". The signature is written in a cursive, flowing style.

Surfrider Foundation, Kaua'i Chapter