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[REDACTED]  
Charlottesville, Virginia [REDACTED]  
USA

Voices for Animals

March 17, 2008

Naval Facilities Engineering Command, LANTDIV  
Attn: Code EV22 (Atlantic Fleet Sonar Project Manager)  
6506 Hampton Blvd.  
Norfolk, VA 23508-1278

A growing body of research confirms that human-generated noise, especially the type of MFA sonar to be used at the AFAST Study Area, can disturb, harm and kill marine life. There is overwhelming evidence linking military sonar to whale strandings. Sonar related strandings have occurred in the Canary Islands, Greece, Bahamas, Madeira, Washington State, Hawaii, North Carolina and Southern Spain, amongst other locations.

228 [ Now, the Navy's operational requirements should not supersede its marine stewardship obligations ] as follows;

229 [ Exercises should not be conducted at night or during other periods when visibility is poor ] [ 230 Areas where marine mammals are known to congregate, such as feeding and breeding areas, should be completely avoided. ]

231 [ Areas close to the migration path of the endangered North Atlantic right whale should be off-limits to navy traffic during the migration season. ]

232 [ The Navy should have at least three trained and dedicated marine mammal observers on all ships equipped the MFA sonar. ]

233 [ When an animal (including dolphins) is observed within 2,000 yards of the sonar dome, the sonar should be shut down until the animal leaves that area. ]

234 [ An after action report should be prepared and made public at no charge. ]

Sincerely,

Nazen Merjian, VFA