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IN REPLY REFER TO:

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Ser 52F00ME/1743

May 4, 2016

Dianne Black, Chair
Channel Islands National Marine Sanctuary Advisory Council
c/o Channel Islands National Marine Sanctuary
University of California, Santa Barbara
Ocean Science Education Building 514, MC 6155
Santa Barbara, CA 93106-6155

Re: Marine Shipping Working Group Final Report, 16 March, 2016

Dear Ms. Black:

The Navy appreciates the Sanctuary's and Sanctuary Advisory Council's (SAC's) ongoing efforts to consider the potential impacts of various activities on marine life in the Region. As a part of the Marine Shipping Working Group (MSWG) efforts, the United States Navy's Naval Air Warfare Center Weapons Division (NAWCWD) staff participated in the MSWG over the past year. The stated purpose of the MSWG was to determine ways to reduce the risk of whale strikes, and improve air quality and navigational safety while minimizing naval operation interruptions and reducing user conflict. Throughout the process, NAWCWD provided input regarding the potential for proposed commercial shipping traffic changes to impact Navy operations on the Point Mugu Sea Range.

The MSWG's final report is now at the Sanctuary Advisory Council for review and action. NAWCWD has reviewed the document and provides the following comments for your consideration. Note that any SAC recommendations will undergo further review by NAWCWD, the Navy, and Department of Defense. Following are specific comments on each of the topics in the MSWG final report:

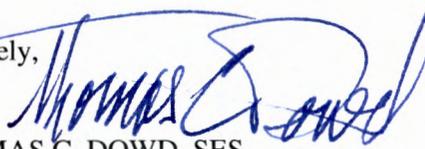
1. Technology-based approach:

- a. Real-time infrared whale detection: The Navy supports the development of new infrared whale detection technologies. The Navy is seeking funding to support this development in the current fiscal year. Use of such technology has the greatest potential to reduce ship strikes in the region via active management/avoidance.
- b. Aerial whale surveys: NAWCWD currently conducts aerial whale surveys and has committed resources this fiscal year to increase the number of surveys south of the Channel Islands. These surveys are necessary to better understand small-scale and seasonal whale abundance as well as habitat use in the Region. The Navy is also currently supporting satellite tagging efforts that will continue to add to the understanding of whale movement.
- c. Collect whale sightings from mariners: The Navy supports efforts to encourage mariners to report whale sighting information and is willing to share the Navy's survey data.
- d. Centralized whale data repository: NAWCWD will continue working with all interested stakeholders on identifying best practices for centralizing data, whether through NOAA server technology or other available sources.
- e. AIS text messaging: NAWCWD supports the use of AIS text messaging through the Marine Exchange of Southern California to notify mariners of known whale aggregations.

- f. Best management practices: NAWCWD supports the development of best management practices for commercial shipping relying on the knowledge and insight of experienced mariners and shipping industry representatives.
 - g. Vessel warning system: NAWCWD supports the development of a vessel warning system, in conjunction with the technologies discussed above and, in particular, as a key component of an infrared detection system.
2. Spatial approach:
- a. Santa Barbara Channel Traffic Separation Scheme (TSS) extension: The Navy does not currently have any objections to an extension of the existing TSS, assuming that it follows a westward extension of the existing Area to Be Avoided (ATBA, discussed below). If the ATBA is not extended, no TSS extension is necessary.
 - b. Western route south of Channel Islands: The Navy does not support any new routing measures south of the Channel Islands. Such lanes would have a serious impact on the Navy's ability to conduct critical operations on the Point Mugu Sea Range. Furthermore, existing data do not support the idea that moving ship traffic south of the Channel Islands would benefit all whale species. In fact, moving the shipping traffic could pose a threat to some species of whales. Absent further data and analyses, it is difficult to determine the potential effect on all species of whale. Also, as noted in the U.S. Coast Guard letter dated 2 March 2016, the Coast Guard does not have any evidence that a new route would increase safety of navigation. We recommend a more flexible approach which includes increased data on whale locations and active management strategies, as opposed to any formal routing measure.
 - c. Expansion of the Area to be Avoided: The Navy supports a moderate westward extension of the existing ATBA. Any expansion, however, should be supported by data on known whale aggregations and should limit unnecessary alterations to current ship traffic patterns. Limiting the ability for ships to utilize existing traffic patterns may increase traffic through the Point Mugu Sea Range. If implemented, an ATBA expansion may be paired with an extension of the existing TSS in the Santa Barbara Channel.
 - d. Vessel speed reduction: The Navy supports vessel speed reduction in areas of concern so long as such reductions do not hinder the Navy's ability to adaptively manage ship traffic around Navy operations. Any vessel speed reduction program should be implemented equally throughout the region so as not to create an incentive for ships to transit the Point Mugu Sea Range.
 - e. Particularly Sensitive Sea Area: It is not clear how such a designation on its own would further the goals of the MSWG. As noted in the MSWG Final Report, any recommendations requiring review by the IMO will require further review by Coast Guard Headquarters. The Navy does not oppose such a designation so long as it is not paired with new routing measures south of the Channel Islands.

Thank you for continuing to involve key stakeholders in the SAC's decision making process. I look forward to ongoing interaction as the MSWG final report is reviewed by the SAC. To support this review, I would like to offer a presentation by my staff to the SAC on the critical nature of Navy operations on the Point Mugu Sea Range and the potential impact of commercial shipping traffic. If you have any questions please contact Mr. John Ugoretz, Marine Resources Manager, at 805-989-4852 or by email at john.ugoretz@navy.mil.

Sincerely,



THOMAS C. DOWD, SES
Director, NAVAIR Ranges, 5.2

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Cc: Mr. Chris Mobley, Superintendent, Channel Islands National Marine Sanctuary
Mr. Mike Murray, Deputy Superintendent for Programs, Channel Islands National Marine
Sanctuary
Mr. Sean Hastings, Resource Protection Coordinator, Channel Islands National Marine
Sanctuary