



MARINE MAMMAL COMMISSION

7 November 2011

Admiral Jonathan W. Greenert
Chief of Naval Operations
2000 Navy Pentagon
Washington, D.C. 20350-2000

Dear Admiral Greenert:

In May of this year the Marine Mammal Commission and its Committee of Scientific Advisors on Marine Mammals met in New Orleans, Louisiana, to review the management of marine mammals and marine ecosystems in the Gulf of Mexico. During the meeting, Mr. Jene Nissan provided a useful overview of Navy activities on its Gulf of Mexico Range Complex. The Commission appreciates his contribution to the meeting. The Commission also understands that the Navy must use parts of the Gulf of Mexico for training and testing activities and that it takes important steps to avoid or minimize effects on the Gulf marine ecosystem, including marine mammals. The following two recommendations are intended to improve the Navy's considerable efforts to manage its impacts on marine mammals.

RECOMMENDATIONS

The Marine Mammal Commission recommends that the Navy—

- review its mitigation and monitoring program for the Gulf of Mexico Range Complex and incorporate into that program the steps necessary to monitor the potential long-term effects of its activities on the Gulf's marine mammals; and
- meet with the Southeast Fisheries Science Center to discuss each other's needs and identify opportunities where the two organizations might collaborate to meet their respective responsibilities.

RATIONALE

The long-term effects of Navy activities in the Gulf

The Navy conducts a wide range of testing and training activities in its Gulf of Mexico Range Complex that may have unintended, adverse impacts on marine mammals. The Commission recognizes and appreciates that the Navy is developing its Integrated Comprehensive Monitoring Program to evaluate and minimize such potential impacts.

For the most part those measures are aimed at preventing short-term effects that result directly from a specific training or testing activity. However, it is possible, if not likely, that the Navy's activities also may have long-term effects that accumulate as a result of multiple activities carried out in the same area over time. Although the Commission appreciates the Navy's attention to the potential short-term effects of its activities, it also believes that the Navy should be assessing and attempting to mitigate the long-term impacts.

The best way to test for such effects is to characterize baseline conditions in the affected areas and monitor to see if and how conditions change from that baseline over time. Developing such a baseline is not a trivial matter because the marine ecosystem is naturally dynamic and also is affected by many other human activities. Nonetheless, assessing baseline conditions is essential if the Navy is to provide assurance that its activities are not causing unintended, long-term, adverse effects on the Gulf's marine mammals and ecosystem. Examples of such effects might be reductions in marine mammal abundance or density in test areas, shifts in distribution, and abandonment of important habitat. To address these concerns and ensure the long-term stability of our marine ecosystems, the Marine Mammal Commission recommends that the Navy review its mitigation and monitoring program for the Gulf of Mexico Range Complex and incorporate into that program the steps necessary to monitor the potential long-term effects of its activities on the Gulf's marine mammals. The Commission would welcome an opportunity to discuss with you how the Navy might extend its stewardship measures to include mitigation of long-term effects.

Developing an adequate baseline for the Gulf's marine mammals

With the exception of the Florida manatee, the National Marine Fisheries Service has primary responsibility for assessing the status of the Gulf's marine mammals. Unfortunately, those assessments fall well short of what is needed to assess the long-term effects of Navy activities. Furthermore, the situation is not likely to improve if left solely to the National Marine Fisheries Service because the Service is anticipating budget restrictions. Clearly, agencies are going to have to be creative to accomplish their goals in the foreseeable future.

Perhaps more importantly, agencies are going to have to work together. The National Marine Fisheries Service has a small but excellent cadre of stock assessment scientists in its Southeast Fisheries Science Center. The Navy, on the other hand, has extensive assets in the Gulf, including infrastructure (e.g., aircraft, vessels) and technological expertise (e.g., passive acoustics). The Commission believes that the Service and the Navy will have a better chance of fulfilling their respective responsibilities if they work together and couple their respective strengths. Clearly, the National Marine Fisheries Service would benefit from access to Navy infrastructure. Just as clearly, the Navy could benefit from being able to tap into the Service's stock assessment expertise. Undoubtedly, the opportunity to collaborate will be limited to certain types of conditions or situations. But under the right circumstances, the Navy and the Service should take advantage of opportunities to help each other meet their needs. Looking back over time, one can see the development of such collaboration and identify its benefits (e.g., progress in understanding the effects of human-generated sound in the marine environment). Potential future opportunities might include Navy exercises that the Service could use for stock assessment purposes, or the Navy's use of Service scientists to help design and implement better mitigation and monitoring methods. For all these reasons, the Marine Mammal Commission recommends that the Navy meet with the Southeast Fisheries Science Center to discuss each other's needs and identify opportunities where the two organizations might collaborate to meet their respective responsibilities.

Admiral Jonathan W. Greenert
7 November 2011
Page 3

The Commission would be pleased to support or facilitate such collaboration however it can. Please contact me if the Commission can assist in any way.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a large, looping 'T' and 'R'.

Timothy J. Ragen, Ph. D.
Executive Director

cc: Bonnie Ponwith, National Marine Fisheries Service
Jene Nissen, CIV USFF N454