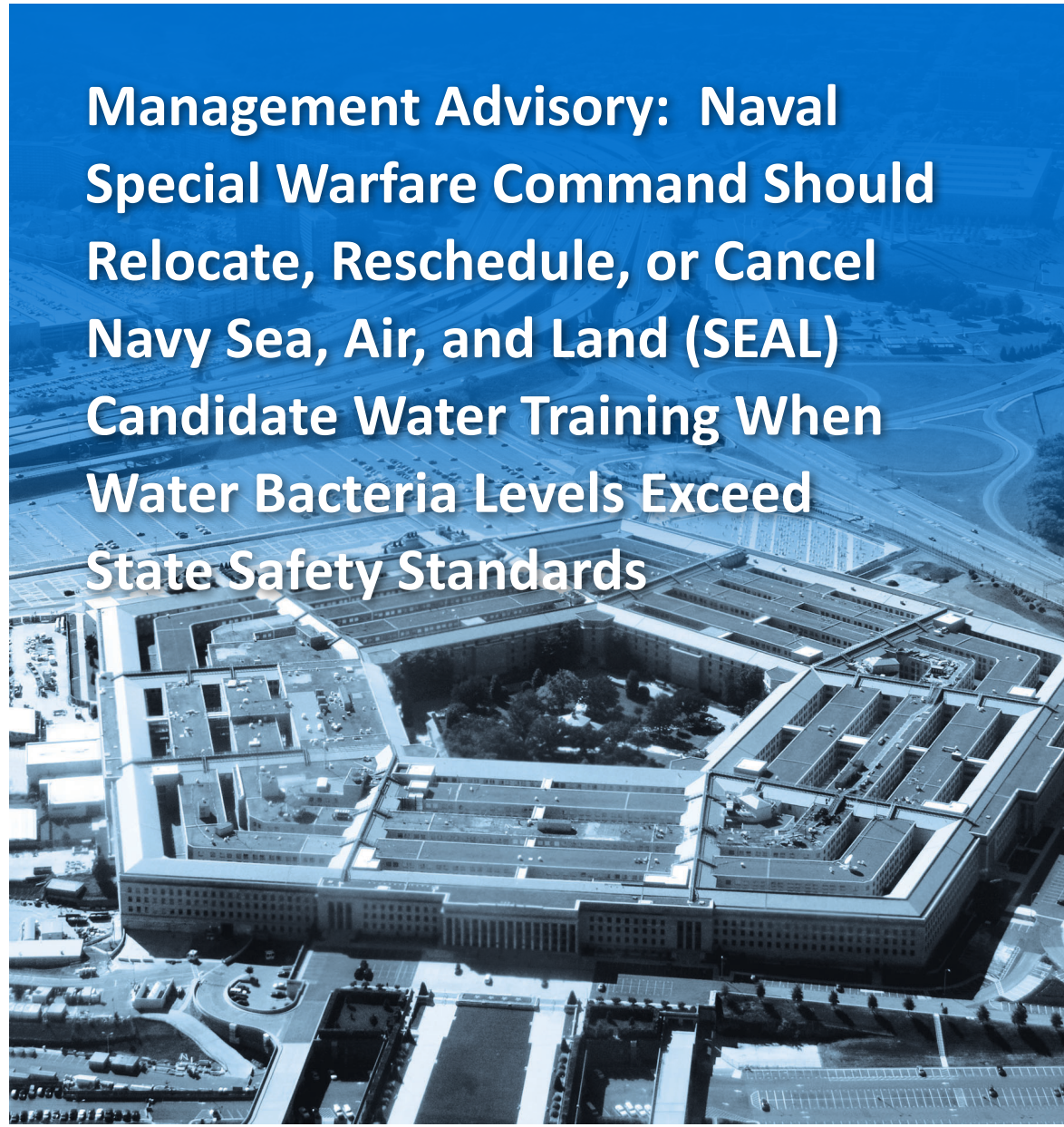




INSPECTOR GENERAL

U.S. Department of Defense

FEBRUARY 7, 2025



Management Advisory: Naval Special Warfare Command Should Relocate, Reschedule, or Cancel Navy Sea, Air, and Land (SEAL) Candidate Water Training When Water Bacteria Levels Exceed State Safety Standards





OFFICE OF INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500

February 7, 2025

MEMORANDUM FOR COMMANDER, NAVAL SPECIAL WARFARE COMMAND

SUBJECT: Management Advisory: Naval Special Warfare Command Should Relocate, Reschedule, or Cancel Navy Sea, Air, and Land (SEAL) Candidate Water Training When Water Bacteria Levels Exceed State Safety Standards (Report No. DODIG-2025-067)

This final management advisory identifies concerns found during the DoD Office of Inspector General's "Evaluation of Medical Care Provided to Navy Sea, Air, and Land (SEAL) Candidates" (Report No. DODIG-2025-008). We previously provided copies of the draft management advisory and requested written comments on the recommendations. We considered management's comments on the draft management advisory when preparing the final advisory. These comments are included in the advisory.

The Naval Special Warfare Command (NAVSPECWARCOM) Commander agreed with the recommendations presented in this advisory; therefore, we consider the recommendations resolved and open. We will close the recommendations when management officials provide us documentation showing that all agreed-on actions to implement the recommendations are completed. Send your response to either [REDACTED] if unclassified or [REDACTED] if classified SECRET.

During our review of medical care provided to Navy SEAL candidates, we assessed the effectiveness with which NAVSPECWARCOM monitors water quality for Navy SEAL candidate training at Naval Amphibious Base (NAB) Coronado. In August 2024, we notified NAVSPECWARCOM that we identified health and safety concerns for Navy SEAL candidates and that we would issue a management advisory.

NAVSPECWARCOM does not conduct water quality testing. Instead, it relies on water quality reports from San Diego County's Beach and Bay Water Quality Program. In May 2022, San Diego County became the first U.S. coastal county to implement the droplet digital polymerase chain reaction (ddPCR) water testing method.¹ The ddPCR tests for fecal indicator bacteria and offers same-day results to inform the public of water quality conditions. The county adheres to the California state health standards and tests for "fecal indicator bacteria as a way of checking water quality as these bacteria are scientifically known to indicate the presence

¹ The ddPCR method is a diagnostic method used to detect and quantify nucleic acids, such as DNA. Test samples are separated into tens of thousands of microscopic droplets, and each droplet is measured digitally. As a result, this method produces precise and reliable measurements of nucleic acids in test samples.

of other bacteria or viruses.”² Several times a week, county personnel collect and test water samples for fecal indicator bacteria from beaches located just north and just south of NAB Coronado.³ The test results determine the appropriate beach status, which is posted at the affected beach and on the program website and telephone hotline.⁴ When the test results exceed state limits, the beaches are closed and remain closed until sample results no longer exceed the state safety standards.

From February 2024 through September 2024, we found that the amount of enterococcus bacteria in the water exceeded state safety levels in 146 of 192 tests (76 percent) conducted on samples retrieved from the beach north of NAB Coronado and 27 of 36 tests (75 percent) conducted on samples retrieved from the beach south of NAB Coronado.⁵ However, during the same period, NAVSPECWARCOM only relocated 12 of 265 Navy SEAL candidate water training events (5 percent), even though closure advisories for the beaches north and south of NAB Coronado were in effect when these trainings occurred because of water contamination.⁶ In addition, during our Hell Week site visit from September 3, 2023, through September 8, 2023, NAVSPECWARCOM did not relocate, reschedule, or cancel three Navy SEAL candidate water training events at NAB Coronado despite San Diego County officials issuing beach closure advisories for excessive enterococcus bacteria in the water. Consequently, Navy SEAL candidates were exposed to contaminated water during these three ocean training events.

Navy SEAL candidate exposure to contaminated water occurred because NAVSPECWARCOM did not follow San Diego County’s Beach and Bay Water Quality Program’s beach closure postings. As a result of Navy SEAL candidate exposure to contaminated water during training, candidates are presented with increased health risks and NAVSPECWARCOM’s training mission could be impacted.

According to an April 2024 memorandum from the Assistant Secretary of the Navy (Energy, Installations, and Environment) (ASN[E,I,&E]), “the broader medical community has established that exposure to ocean water that exceeds state limits can lead to acute gastrointestinal illnesses (AGI) like nausea, vomiting, and diarrhea.”⁷ The memorandum stated that between January 2019 and May 2023, the Naval Special Warfare Center diagnosed 1,168 cases of AGI among Navy SEAL and Special Warfare Combat Crewman candidates at

² County of San Diego Department of Environmental Health and Quality Website, “Beach and Bay Program,” accessed August 27, 2024, <https://www.sandiegocounty.gov/content/sdc/deh/lwqd/beachandbay.html>.

³ County of San Diego Department of Environmental Health and Quality Brochure, “Check In Before You Get In,” accessed August 27, 2024, https://www.sandiegocounty.gov/content/dam/sdc/deh/lwqd/Beach&Bay/Brochure_English.pdf. The fecal indicator bacteria that San Diego County tests for are total coliform, fecal coliform, and enterococcus bacteria. Enterococcus bacteria is generated from soil and decaying vegetation, storm water, and urban runoff from animal and human waste.

⁴ Beach status is reported as open, advisory, warning, or closure.

⁵ An enterococcus bacteria level exceeding 1,413 copies of bacteria per 100 milliliters of water sampled exceeds state health standards.

⁶ During the same period, NAVSPECWARCOM canceled a portion of one additional Navy SEAL candidate water training event because of water contamination. NAVSPECWARCOM did not reschedule any water training events during this period.

⁷ ASN(E,I,&E) Memorandum, “Response to the San Diego Congressional Delegation January 2024 Request for Information Regarding Impacts on Naval Training from Cross-Border Pollution in the Tijuana River Valley and the Pacific Ocean,” April 8, 2024.

NAB Coronado. Of these cases, 457 (39 percent) were diagnosed within 7 days of exposure to ocean water that exceeded state limits.⁸ According to the memorandum, Naval Special Warfare Center partnered with the Naval Health Research Center in November 2023 to examine the relationship between water quality standards, as tested by San Diego County, and incidences of AGIs in Navy SEAL and Special Warfare Combat Crewman candidates. The ASN(E,I,&E) memorandum stated that the study is estimated to take 12 months and aims “to determine any connection between acute gastrointestinal illness cases and in-water training events when water quality exceeds San Diego County limits.”

Additionally, the Naval Sea Systems Command Manual SS521-AJ-PRO-010, “Guidance for Diving in Contaminated Waters,” states that effects of exposure to contaminated water may be evident immediately or delayed for many years.⁹ Manual SS521-AJ-PRO-010 also states that chronic, sub-toxic exposure to a variety of chemical hazards may induce illnesses such as cancer, neurodegenerative disorders, and hormonal dysregulation.

Management Comments on the Finding and Our Response

Although not required to comment, the Naval Inspector General (NAVINSGEN) provided comments on the Finding. For the full text of the NAVINSGEN’s comments, see the Management Comments section of the advisory.

NAVINSGEN Comments

The NAVINSGEN stated that Sailors’ safety during [Navy] SEAL candidate training and after graduation is paramount and that continued successful force generation, sustainment, and employment under difficult conditions must also remain a high priority. However, Naval Special Warfare cannot easily cancel or relocate 75 percent of its water training activities. The NAVINSGEN supports the establishment of a working group that should include epidemiology, preventive medicine, and infectious disease experts. Additionally, the NAVINSGEN recommends continuing a multi-disciplinary approach with appropriate transparency to facilitate safe training environments that help achieve the rigorous [Navy] SEAL candidate and operational unit training objectives to support global operational requirements.

Our Response

We acknowledge the NAVINSGEN’s comments, but their comments did not require a revision to the advisory.

⁸ The Navy noted that, “prior to May 2022, exposure to water above limits was due to latent test results, which indicated that in-water events had occurred in the days prior when water was above the limits.”

⁹ Naval Sea Systems Command Manual SS521-AJ-PRO-010, “Guidance for Diving in Contaminated Waters,” October 4, 2019.

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend that the Commander of the Naval Special Warfare Command:

- a. **Develop and implement policy that establishes the roles and responsibilities for monitoring water quality and relocating, rescheduling, or canceling water training when bacteria levels exceed state health standards.**
- b. **Develop and implement notification procedures for relaying water quality results and the decision to alter the training schedule to officials in the Naval Special Warfare Command.**

NAVSPECWARCOM Comments

The NAVSPECWARCOM Commander agreed and stated that NAVSPECWARCOM intends to document and promulgate the policy and standard operating procedures (SOP) no later than December 31, 2025. The NAVSPECWARCOM Commander stated that they intend to continue using San Diego County's Beach and Bay Water Quality Program (County of San Diego Department of Environmental Health and Quality Website) as the basis for determining beach status and implementing applicable curriculum or training modifications. However, as a Federal entity, NAVSPECWARCOM retains flexibility to determine SOPs independent from state requirements. Additional analysis would be required to determine the fiscal impact of relocating from the local area or rescheduling or canceling in-water training evolutions when bacteria levels exceed state health standards.

Our Response

Comments from the NAVSPECWARCOM Commander met the intent of the recommendation; therefore, the recommendation is resolved but will remain open. We will close this recommendation after we verify the implementation of the policy for monitoring water quality and relocating, rescheduling, or canceling water training when bacteria levels exceed state health standards and verify that notification procedures have been implemented for relaying water quality results and the decision to alter training schedules.

If you have any questions, please contact [REDACTED].



Bryan T. Clark
Assistant Inspector General for Evaluations
Programs, Combatant Commands, and Operations

Management Comments

Naval Special Warfare Command



DEPARTMENT OF THE NAVY
NAVAL SPECIAL WARFARE COMMAND
2000 TRIDENT WAY
SAN DIEGO CA 92155-5599

7500
Ser N00/011
10 Jan 25

From: Commander, Naval Special Warfare Command
To: Department of Defense Inspector General

Subj: COMMANDER, NAVAL SPECIAL WARFARE COMMAND RESPONSES TO
RECOMMENDATIONS IN DOD IG'S 3 DECEMBER 2024 MANAGEMENT
ADVISORY (PROJECT NO. D2023-DEV0PB-0099.001)

1. Response to Recommendation 1a. Develop and implement policy that establishes roles and responsibilities for monitoring water bacteria levels, and to relocate, reschedule or cancel water training evolutions when water bacteria levels exceed State health standards.

2. Concur – Commander, Naval Special Warfare Command (COMNAVSPECWARCOM) concurs with the recommendation. We intend to document and promulgate Standard operating Procedures (SOP) no later than 31 December 2025. COMNAVSPECWARCOM intends to continue using San Diego County's Beach and Bay Water Quality Program (County of San Diego Department of Environmental Health and Quality Website) as our basis for determining beach status and implementing applicable curriculum and or training modification(s). Per the subject Management Advisory, San Diego County's Beach and Bay Water Quality Program adheres to California state health standards when assessing water quality. However, as a federal entity, COMNAVSPECWARCOM retains flexibility to determine SOP independent from state requirements. Additional analysis would be required to determine fiscal impact of relocating from the local area, rescheduling, or canceling in-water training evolutions when bacteria levels exceed state health standards.

3. Response to Recommendation 1b. Develop and implement notification procedures for relaying water testing results to be considered in the decision to relocate or revise training schedules.

4. Concur - COMNAVSPECWARCOM concurs with the recommendation. We intend to complete and promulgate no later than 31 December 2025. Additional analysis would be required to determine fiscal impact of relocating from the local area, rescheduling, or canceling in-water training evolutions when bacteria levels exceed state health standards.


M. J. SANDS III

Naval Inspector General



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NAVAL INSPECTOR GENERAL
1254 9TH STREET SE
WASHINGTON NAVY YARD, DC 20374-5006

1000
Ser IG00/025
21 Jan 25

MEMORANDUM

From: Naval Inspector General
To: Department of Defense Office Of the Inspector General

Subj: MANAGEMENT ADVISORY: NAVAL SPECIAL WARFARE COMMAND
SHOULD RELOCATE, RESCHEDULE, OR CANCEL NAVY SEA, AIR, AND LAND
CANDIDATE WATER TRAINING WHEN WATER BACTERIA LEVELS EXCEED
STATE SAFETY STANDARDS

1. The Office of the Naval Inspector General (NAVINSGEN) acknowledges the recent report addressing Sea, Air, and Land (SEAL) training in San Diego County. Our Sailors' safety during SEAL candidate training and after graduation is paramount. Continued successful force generation, sustainment and employment under difficult conditions must also remain their highest priority.
2. Naval Special Warfare (NSW) will have a challenge canceling or relocating 75 percent of their water training activities. Practically speaking, NSW operators would require systems or protocols that would enable them to both train and operate while managing preventable risk.
3. NAVINSGEN supports NSW's efforts to establish a working group (WG) on the topic that should include experts in the fields of epidemiology, preventive medicine, and infectious disease, among others. Updated knowledge and evidence-based protocols should be the outcomes from the WG.
4. With no established safe exposure levels to contaminated water in healthy adults, surveillance and maximum mitigation efforts should continue. After reviewing county water data, shifting training to locations that achieve training goals while exposing Sailors to the lowest acceptable risk (e.g., bay vice ocean) is often a viable mitigation. The NSW WG should also consider the recent changes in San Diego County's testing protocols that are shifting from a colony forming units (CFUs) methodology to a much more sensitive digital droplet polymerase chain reaction (dd-PCR). However, to date, the clinical significance is not completely understood.
5. NAVINSGEN recommends continuing along a multi-disciplinary approach, with appropriate transparency to facilitate safe training environments that help achieve the rigorous SEAL candidate and operational unit training objectives to support SEAL/NSW global operational requirements.

A blue ink signature of J. V. Fuller, consisting of a stylized, cursive script.

J. V. FULLER

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U.S. DEPARTMENT OF DEFENSE

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