

Good afternoon. My name is Christina Hendrickson, and I am from Girdwood, Alaska. I represent the Eyak Preservation Council, or EPC, based in Cordova. My remarks focus on Agenda Item B9, the U.S. Navy's presentation.

My intent is to advocate that the Council further engage the U.S. Navy and obtain a commitment to move its Northern Edge training to the fall and winter months, per the purpose and need of its Supplement Environmental Impact Statement.

My background is Environmental Law. Previously, I was a defense contractor at the Pentagon. I worked with the Army, Navy, Air Force, Marines, and Coast Guard. I specialized in the environmental assessment and impacts of military weaponry, training ranges, and exercises. In Alaska, I have worked on and permitted military-related and resource development projects. These successful projects are the result of thoughtful stakeholder engagement that weighs input and satisfies government to government consultations among coordinating and cooperating agencies and Tribes.

EPC's mission is to honor Eyak heritage and conserve wild salmon habitat and culture through education, awareness and promotion of sustainable lifeways for all peoples.

Last spring at COMFish, the U.S. Navy stated, not proposed, that its Northern Edge would be hosted in the beginning of May 2017. It released a Supplement EIS in August 2017, seeking renewal of five year permits.

For this document, the U.S. Navy did not update with the best available science and instead concluded no adverse impacts despite these statements, for example, from the Fish section:

- "little is known about the very important issues of nonmortality damage in the short and long-term, and nothing is known about effects on behavior of fish." Final Environmental Impact Statement (FEIS) at Section 3.6 Fish at pg. 3.6-31.
- "Based upon currently available data it is not possible to predict specific effects of Navy impulsive sources on fish. At the same time, there are several results that are at least suggestive of potential effects that result in death or damage." Navy FEIS at Section 3.6 Fish at pg. 3.6-32.
- "Fish not killed or driven from a location by an explosion might change their behavior, feeding pattern, or distribution." SEIS at Section 3.6 Fish at pg. 3.6-18.

Subsequent sections on marine mammals, birds, and even socioeconomics read the same: inconclusive evidence at this time, yet the U.S. Navy concludes no significant impacts.

And yet the U.S. Pacific Fleet Environmental Readiness Division sponsored a poster at last week's Alaska Marine science symposium. Since 2009, the U.S. Navy spent \$4.5M in marine mammal monitoring in the GOA, in almost the exact area of the proposed TMAA. Data collected include over 90,000 hours of acoustic data, and in 2015 alone they encountered 315 cetaceans representing 6 species. At the same symposium, there were no less than 25 other posters relating to research in GOA that could have used for additional, more robust and less arbitrary conclusions in the SEIS.

For each resource area of concern, the U.S. Navy's conclusion contradicts the available scientific literature on noise and ignores the valid and documented concerns of fishermen, regional tribal villages and coastal communities.

EPC took the lead in contacting Senators Murkowski and Sullivan. In response, on September 16<sup>th</sup>, 2016, Senator Murkowski sent a letter to the Secretary of the Navy requesting that they, "proactively work with stakeholders in planning for Northern Edge 2017." In November and December 2016, the U.S. Navy

responded with presentations at City Council meetings, peppered with smaller engagements at Chamber of Commerce meetings. None of these meetings were advertised on the Navy's listserv or their project website, [www.goaeis.com](http://www.goaeis.com). These short public meetings are not the appropriate forum for meaningful engagement. Many constituents' questions and comments went unanswered; and none of the representatives gave indication that the U.S. Navy would consider rescheduling its exercise, in light of the communities' insistence.

Prior to this training commencing in May, three things need to happen. There is a final planning meeting among the exercises' participants. A Record of Decision is to be published. And the NMFS must issue a Letter of Authorization.

NMFS disagreed with the U.S. Navy as documented on page 152 of the EIS. The Navy even ignored its our subject matter experts. It has an Environmental Sustainable Development to Integration Program. It published Factsheet #418, which states that "underwater explosions have the potential to damage critical habitat and adversely impact marine species such as fish and marine mammals." This was not cited in the EIS.

May is one of the prime months for species migration into the GOA. This audience knows this is the beginning of commercial fishing, derbies, shorebird festivals, and subsistence harvests. Millions of animals migrate through this area and are the base of our local economies of fishing and tourism.

The U.S. Navy is seeking authorization to disperse up to 352,000 pounds of expended materials from bombs, missiles, targets and pyrotechnics, naval gun shells, small-caliber rounds, and sonobuoys in to the Gulf of Alaska, including areas designated as Essential Fish Habitat. 10,500 pounds of that is hazardous with lead, cyanide, cadmium and more. There is no marine debris cleanup plan.

While the U.S. Navy has said they are not using hardly any explosives in Northern Edge 2017, they have not made a legal commitment to using less than the amount for which they are seeking authorization. The U.S. Navy confirmed the ROD will not limit the amount of ordnance and sonar requested for use in these exercises. They are not beholden to those numbers. Moreover, future exercises in 2019 and 2021 may change in scope and the use of weaponry, munitions, and sonar as long as it does not exceed the limits in the SEIS.

As an old Colonel once told me, "Wars are not fought on blue bird days. You train as you fight."

Lt. Col. Bobinski, the one who came to Cordova's December meetings, is on record stating just that in the Ketchikan's Stories in the News in 2015. In Homer in Dec 2016, Lt. Col Sander stated that the intent of the exercises was to place soldiers in the "most challenging scenarios seen in theater."

Also in Homer, Lt. Col Sander stated that the rationale for May is weather and safety. They stated that they were concerned about rescuing a pilot who had to eject over water. And yet in Cordova, they stated that no aircraft carrier is scheduled to participate this year. And even when those carriers show up, they are stationed at the north most edge of the TMAA so as to conserve fuel from planes transiting from over land based air exercises. Further, the USCG participates in this exercise, expressly to train rescue swimmers and pilots based in Kodiak.

In summary, EPC asks that the Council advocate for the training to be moved to fall and winter months. Listen to the constituency of 6 Alaskan coastal communities who have passed Resolutions expressly requesting that the Navy do just that. Join Homer, Sitka, Cordova, Valdez, Tenakee Springs, and Girdwood.

- Don't be fooled by lower numbers; there is no commitment to them.

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- Don't be fooled by use of vessel based species observers who are only looking for surface disturbance.
- Don't be fooled by economic benefits only seen in Anchorage-bowl and purely estimates with no real valuation, as proven in FOIAs.
- Don't be fooled by the lure of port calls and contracted vessels. Last time, there were no port calls and contracted vessels amounted to 4 from Kodiak
- Don't be fooled by their "appreciation" of our "unique environment." To them, it's a training range.
- Don't be fooled by check the box engagement of 10 minute presentations at Chamber of Commerce and Council meetings with little Q&A and/or loquacious and vague answers given by representatives
- Don't be fooled by providing comments on goaeis.com; they are under no obligation to review or weigh them now that the ROD is being prepared.

Demand adequate engagement and use of best available science. Protect our livelihood, our local economies, and our culture.