

# Afognak Wilderness Lodge LLC.

P.O. Box SYB, Seal Bay; 1 Happy Lane; Kodiak, Alaska 99697

Catering to: Adventurous Vacationers • Photographers • Fishermen • Hunters

Radio-phone: (360) 799-3250  
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E-mail: reservations@awl-3.com  
Website: www.afognaklodge.com

Shannon, Josh & Luke Randall  
Founders & Operators

RECEIVED July 26, 2017  
AUG 2 2017

North Pacific Fishery Management Council,  
605 W. 4<sup>th</sup> Avenue, #306,  
Anchorage, AK 99501.

RECEIVED  
AUG 2 2017

RE: Halibut closure dates

To all concerned,

*As a lodge and charter boats operator, we'd like to voice our concern about your poor decision to have **two back-to-back days** (Tuesday & Wednesday) when we could not legally take any halibut. This has really messed up the vacation of several of our guests, who travel from far and wide, for just a few days with us . . . and many other lodges & charter boats.*

*It would have been a much wiser choice to have the two days spread out evenly during each week. It would have reflected a higher degree of public consideration and your own common sense. Because it is so unreasonable, your rules are more likely not respected thus encouraging some normally law-abiding people to bend or break the newly imposed rule, thus defeating your fishery management objective.*

*We trust that you'll take this into consideration when forming future closure dates.*

Cordially,



Shannon Randall,  
Afognak Wilderness Lodge

Cc – Kurt Iverson,  
P.O. Box 21668,  
Juneau, AK 99802



September 26, 2017



North Pacific Fisheries Management Council  
Attention: Dan Hull, Chairman  
605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252  
[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Dear Chairman Hull,

The Eyak Preservation Council (EPC) and its campaign, Summer is for Salmon (SIFS), respectfully submits the following comment for the October 2017 Council Meeting.

On 1 February 2017, The U.S. Navy presented to the Advisory Council on its planned training exercise in the Gulf of Alaska called Northern Edge. The Council asked questions of the three-member delegation and then heard public testimony from three Alaskans, including SIFS staff member, Christina Hendrickson (please see attached copy of comments read into the record).

After public testimony, the Council discussed and requested that your Executive Director use Protected Resources and Essential Fish Habitat staff to draft summary reports and recommendations. Council members recommended sending a letter to the U.S. Navy that includes questions regarding the rationale for the May timing of Northern Edge '17; questions regarding the proximity of boundaries to protected areas and coastal communities; and, issues of concern regarding the U.S. Navy's Finding of No Significant Impact in light of the strong comments from constituents that questioned legal validity of the "best available science" on which the U.S. Navy's Record of Decision is based.

On 14 February 2017, Mr. Oliver sent the attached letter to the U.S. Navy, requesting they report back to the Council how many and what ordinance and sonar were used, and a presentation prior to any future exercise. In Spring 2017, SIFS remained engaged with the U.S. Navy, Alaska's coastal communities, and Senator Murkowski's office.

SIFS united 11 communities in passing Resolutions requesting that the U.S. Navy change the timing and location of its Northern Edge exercises from 2017 and beyond. SIFS organized a letter campaign for the 10,149 salmon commercial permit holders in Alaska, of which 1,217 responded with letters to Senator Murkowski on the issue. During the Senate Appropriations, Armed Forces Subcommittee hearing in May 2017, Senator Murkowski used copy provided to her by SIFS staff, charging Admiral Richardson to uphold its social contract with the local communities to conduct exercises in the waters that provide their livelihood (e.g., high value fisheries). Admiral Richardson testified, *"After the exercise, [we will] do some community engagement to make sure we fully understand that the exercise went as good as it could in this version, and maintain an engagement between exercises to build that habitual relationship."*<sup>1</sup>

In June 2017, Senator Murkowski responded to Rick Steiner about Northern Edge '17 (copy enclosed). She stated in her conversation with Admiral Richardson, he *"observed that the Navy and the community must see the same things and see them the same way."*

<sup>1</sup> See video on [www.summerisforsalmon.org](http://www.summerisforsalmon.org)

PRESERVING WILD  
SALMON HABITAT &  
INDIGENOUS CULTURE

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*And that requires continued conversations about science.” Additionally, she asked the U.S. Navy to “conduct a new round of community engagements to discuss the 2017 and 2019 exercises with the Gulf of Alaska stakeholders.”*

We reviewed the agenda for the Council’s upcoming meeting in October and we are disappointed to see that the U.S. Navy is not on it. The U.S. Navy’s absence on your October agenda is a contradiction to their commitment and your formal request. Why are they not scheduled to provide you and the Council a report on what ordinance and sonar were used, as requested in your letter?

To date, the U.S. Navy’s only after action report consisted of a ten-minute canned presentation to the Homer City Council, without community question and answers, and no early engagement on 2019. And yet, already Pacific Command and Alaska Command kicked off planning for Northern Edge ‘19, according to Senator Murkowski’s staff who visited with these parties in August 2017. Admiral Korka and staff will travel to Cordova on 11 October 2017 for a community council meeting and attend a Kodiak Island Borough work session in Kodiak on 12 October 2017.

These community visits are not adequate engagement. These forums do not provide communities and stakeholders with an opportunity to directly question the U.S. Navy. Instead, like the public comment process in your meetings, stakeholders have a few minutes per person to express their concerns. Attached for your reference is the U.S. Navy’s presentation from Homer; its content does not respond to community concerns expressed in previous engagements, nor the content of the 11 Resolutions, available at [www.summerisforsalmon.org](http://www.summerisforsalmon.org).

Respectfully, we request that you re-engage the U.S. Navy on behalf of your stakeholders and the 11 communities that passed Resolutions requesting that the U.S. Navy move Northern Edge to the fall and winter months and farther offshore – out of Essential Fish Habitat. Please insist that their presentations and reports to you demonstrate how decisions were based on “best available science.” Insist that their report to you includes sufficient detail as requested in your letter. Insist that they engage your stakeholders and uphold the commitments they have made.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Emily Stolarcyk'.

Emily Stolarcyk  
Program Director  
Summer is for Salmon

*Enclosure 1: Christina Hendrickson’s comments on 1 February 2017*  
*Enclosure 2: NPFMC Letter to U.S. Navy, 14 February 2017*  
*Enclosure 3: Senator Murkowski’s letter to Rick Steiner, 21 June 2017*  
*Enclosure 4: Northern Edge 2017 presentation to Homer City Council*

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.

- 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.

# North Pacific Fishery Management Council

Dan Hull, Chairman  
Chris Oliver, Executive Director



605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

Telephone (907) 271-2809

Fax (907) 271-2817

Visit our website: <http://www.npfmc.org>

February 14, 2017

Lieutenant General Kenneth Wilsbach  
Commander, Alaskan Command  
9480 Pease Ave., Suite 110, JBER  
Alaska, 99506-2101

Dear General Wilsbach,

On behalf of the North Pacific Fishery Management Council, I would like to express my sincere thanks to Colonel Christopher Reifel from the Alaskan Command, and Ms. Amy Burt and Ms. Andrea Balla-Holden from the U.S. Navy, for taking the time to thoroughly explain plans for the NORTHERN EDGE 2017 joint training exercise scheduled for May 1 - 12, 2017 in the Gulf of Alaska. This presentation was not only helpful for the Council, but also to the many stakeholders in the fishing industry present at our meeting and listening in on our webcast. One of the functions of the regional fishery management council system is to conduct outreach to the fishing industry, so having the Colonel come to our meeting and taking the time to engage the fishing industry was greatly appreciated.

During the presentation, a few concerns were raised by stakeholders regarding potential environmental impacts of the training exercise. To address their concerns, it would be very helpful for the Council to receive a brief update regarding Northern Edge 2017 after it has been completed. In this report, we request that the Alaskan Command confirm that the organizational plan and level of activity as presented to the Council was followed, and if not, how it may have differed. Additionally, given the positive feedback we received on the 2017 Northern Edge preparations report, the Council would like to receive updates prior to future Northern Edge exercises.

Again, we thank you for taking the time to come to our meeting, and for your continued service to our great Nation.

Sincerely,

A handwritten signature in blue ink that reads "Chris Oliver". The signature is written in a cursive, flowing style.

Chris Oliver  
Executive Director

Cc:

REIFEL, CHRISTOPHER S Col USNORTHCOM ALCOM ALCOM/DCoS [christopher.reifel@us.af.mil](mailto:christopher.reifel@us.af.mil)  
Burt, Amy E CIV NAVFAC NW, OP3E21 [amy.burt@navy.mil](mailto:amy.burt@navy.mil)  
Balla-Holden, Andrea N CIV COMPACFLT, N465ABH [andrea.ballaholden@navy.mil](mailto:andrea.ballaholden@navy.mil)



LISA MURKOWSKI  
ALASKACOMMITTEES:  
ENERGY AND NATURAL RESOURCES  
CHAIRMANAPPROPRIATIONS  
SUBCOMMITTEE ON INTERIOR,  
ENVIRONMENT, AND RELATED AGENCIES  
CHAIRMANHEALTH, EDUCATION, LABOR,  
AND PENSIONS

INDIAN AFFAIRS

## United States Senate

WASHINGTON, DC 20510-0203  
(202) 224-6665  
(202) 224-5301 FAX

June 21, 2017

Mr. Rick Steiner  
9641 Homestead Trail  
Anchorage, Alaska 99507-6729

Dear Rick:

Thank you for writing to share your concerns about the Navy's participation in the Northern Edge 2018 exercise in the Gulf of Alaska. It is good to hear from you.

In the aftermath of Northern Edge 2015, I requested that the Navy conduct a series of meetings with stakeholders in Gulf of Alaska communities well in advance of the Northern Edge 2017 exercise. This request was agreed to. The Navy conducted 15 stakeholder engagements and 2 tribal consultations in advance of Northern Edge 2017.

In response to the input received at these meetings the Navy indicated that it would limit the scope and intensity of activities conducted during Northern Edge 2017. Looking to the future, the Navy also chose the less intense of two courses of action described in the Supplemental Environmental Impact Statement for the conduct of future Northern Edge exercises in the Gulf of Alaska. To better educate the public about its activities in the Gulf of Alaska, the Navy conducted two port calls in connection with the exercise: one in Homer and the other in Juneau.

The Northern Edge 2017 exercise is now concluded and the Navy has begun planning for the Northern Edge 2019 exercise. Although the Navy does not believe that the 2017 exercise adversely impacted the fishery and marine mammal stocks in the Gulf of Alaska, it is well aware of your concern that military exercises on the water should not be conducted in such close proximity to the opening of high value commercial and subsistence fisheries, as is the case with a May exercise. The Navy is also acutely aware that many stakeholders do not trust the science that the Navy relies upon in its assessment of potential impacts.

Since the conclusion of Northern Edge 2017, I have had an opportunity to discuss both of these issues with Admiral John M. Richardson, the Chief of Naval Operations. Admiral Richardson is the nation's top ranking naval officer and holds a seat on the Joint Chiefs of Staff. Admiral Richardson confirmed to me that the Navy is exploring a change in the dates of the 2019 exercise with the exercise sponsor, the US Pacific Command. He also acknowledged that the Navy must do more to build trust and confidence in the stakeholder communities. He expressed a desire, going forward, for the Navy to be one with the community. In order for this to occur, Admiral Richardson observed that the Navy and the community must see the same things and see them the same way. And that requires continued conversations about the science.

Toward this end, I have asked that the Navy conduct a new round of community engagements to discuss the 2017 and 2019 exercises with the Gulf of Alaska stakeholders – what



went right, what caused dissatisfaction, what should be done better and at what level of risk. Admiral Richardson agrees that this is important. The Navy has committed to conduct a series of "after action" engagements with stakeholders to receive your input. I hope that you will participate in these ongoing discussions.

Thank you once again for contacting me with your concerns about Northern Edge 2017.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Murkowski". The signature is fluid and cursive, with the first name "Lisa" and last name "Murkowski" clearly legible.

Lisa Murkowski  
United States Senator



# NORTHERN EDGE 2017

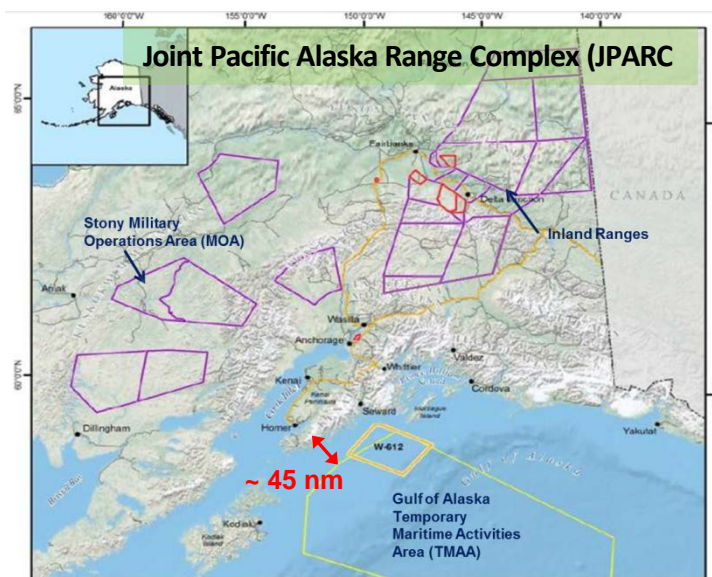
**Tim Croft, Alaskan Command  
and  
Chip Johnson, U.S. Pacific Fleet**

**Homer City Council  
August 14, 2017**



# NORTHERN EDGE 17

- **U.S. Pacific Command (USPACOM) - sponsored exercise planned and run by Alaskan Command (ALCOM)**
- **Objectives developed in conjunction with and support of USPACOM and Service Components (Air Force, Army, Navy, Marine Corps), and with USCG support**
- **Replicates most challenging scenarios in USPACOM theater**
  - Navy, Marine Corps, and Air Force practiced and refined challenging joint interoperability tactics, techniques, and procedures
  - Alaskan-sized spaces and range infrastructure facilitated realistic, robust scenarios including vast distances modern military forces face
  - Over 1,700 sorties (Take Offs) & 4,000+ flight hours during NE17







# NE17 Timeline and Economic Impact



## NE17 AK-Wide Economic Impact Estimate

- Visiting personnel spending – \$12,400,000
- Contracts – \$7,900,000
- Base Support Wages – \$7,700,000

***Total - estimated over  
\$28,000,000***

## Dates & Participants

- Dates: 1-12 May 2017
- DoD:
  - 6,000+ personnel
  - > 160 aircraft
  - 2 Navy destroyers + 1 supply ship
- Non DoD:
  - 1 USCG vessel, 5 civilian fishing boats
- Virtual participants from multiple US locations
- 26 test & experimentation initiatives
- Navy ship port visits to Homer & Juneau



Homer



Juneau



# NE 17 Homer Economic Impact



## Some details

- \$250,000 – 275,000
- Lodging, Fishing Charters, Restaurants, Tours, Shuttle Service, Groceries
- Port & Harbor Dockage, Water, Security, Longshoremen

## USS Hopper Port Visit

- Dates: 29 Apr – 2 May 2017
- 280+ personnel on board
- 2.5 days
- Local Businesses
  - Provided welcoming Fish Fry
  - 100 lunches/dinners provided for those remaining per shift on ship
  - American Legion - Free meals provided, Sat/Sun/Mon evenings



*USS Hopper (DDG 70) port visit to Homer AK*



# NE17 Navy Maritime Goals and Activities Conducted

Public Comment  
October 2017

*Navy activities occurred in the TMAA from 1-12 May 2017*

## • Ships

- 2 Navy surface combatant ships (Destroyers)
- 1 support/replenishment ship (fuel/food)
- 1 Coast Guard vessel
- ~5 Contracted Alaskan fishing vessels  
(to simulate opposition forces)

## • Training objectives and activities

- Coordination and integration with joint forces
- Practice anti-submarine exercises with ships  
(i.e., tracking simulated submarine)
- Practice in Visit, Board, Search, and Seizure (VBSS) techniques
- Aircraft combat maneuvering between land and maritime areas
- Ship and personnel gunnery training



*USS Hopper (DDG 70)*



*USS O'Kane (DDG 77)*



*USNS Guadalupe (T-AE 200)*



*VBSS team approaching "opposition vessel"*

*Small arms qualification  
aboard Navy ship*







# Environmental Planning

**ALT1: SEIS analyzes maximum levels of activity – Actual activity for NE17 considerably less (e.g. 12 days, no explosives used)**

- ***July 2016: Released Final SEIS/SOEIS (Supplement to 2011 EIS)***
- ***April 2017: Navy issued Record of Decision (ROD) & NMFS issued final MMPA Permit and ESA Biological Opinion for TMAA activities from 2017-2022***
  - **Process included extensive public participation and formal Government-to-Government Consultation with Alaska Native Tribes**

Best Available Science showed impacts not significant under both alternatives considered

After carefully weighing future strategic and operational requirements, and environmental consequences of Proposed Action as well as comments received from government agencies, Alaska Native Tribes, and the public, the Navy elected to proceed with Alternative 1 of the SEIS

**\* *Alternative 1***

- ***1 annual large-scale 21-day Carrier Strike Group (CSG) exercise between Apr–Oct***
- ***No sinking exercise***

(Alternative 2 not selected and included 2 annual CSG exercises, each occurring over a maximum time of 21 consecutive days each Apr–Oct; 1 sinking exercise per CSG exercise for total of 2 per year)



# NE17 Navy Environmental Summary

- **Less Gulf of Alaska Navy activity sought and authorized (Alt 1)**
  - Only 12 days (vice maximum of 21 days in SEIS)
  - Minimum active SONAR use compared to SEIS level
  - No explosive ordnance used (i.e., no live bombs or explosive 5-inch gun rounds)
- **No events (SONAR or ordnance) triggered procedural measures**
  - No marine mammals sighted within required mitigation zones, so no power down or shutdown of SONAR needed
  - 2,880 hours of shipboard lookout effort during 12 days
- **No indications or evidence of any environmental impacts**
- **Navy not aware of any interactions or conflicts with other users of maritime environment (e.g. fishing, shipping, aircraft)**
- **Reporting – to be posted on Navy Marine Mammal Monitoring website**
  - *Exercise Reporting*: Report required by NMFS permit being prepared
  - *Monitoring Reporting*: 3 passive acoustic monitoring devices deployed from Apr-Sep 2017; Analysis and report to NMFS publically available July 2018  
<https://www.navy-marinespeciesmonitoring.us/>



# Protective Mitigation Measures

## Extensive mitigation measures developed in coordination with NMFS

- Implement mitigation zones for sonar and explosive activities
- Post qualified Lookouts
- Monitor mitigation zones before and during training
- Report monitoring results and training activities
- Coordinate with regulatory agencies stranding program
- Conduct offshore population surveys and other marine mammal monitoring research



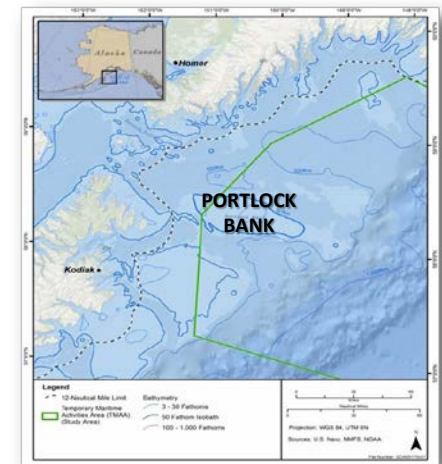
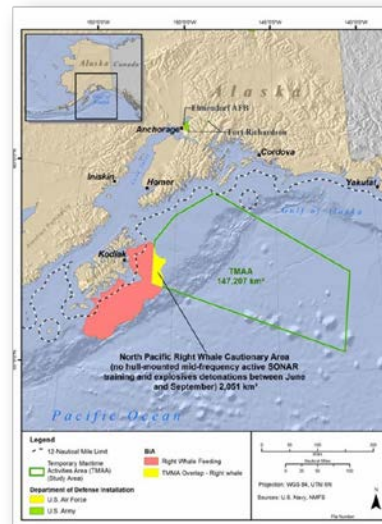
## **\*\*\*New Mitigations for NE17\*\*\***

### North Pacific Right Whale Cautionary Area during feeding time (*Jun-Sep*) [below left]

- No surface ship hull mounted sonar
- No explosives

### Portlock Bank [below right]

- No explosives use










# NE17 Usage

**SONAR – actual usage not publicly releasable but minimal amount of SONAR in NE17**


Training Ordnance or Expended Materials	Maximum Amount Analyzed in the Final Supplemental EIS/OEIS Alternative 1	Actual NE17 Level of Activity
Bombs	180	0
Missiles	33	0
Naval Gunshells (Various Types)	13,188	28 ( <u>all inert/non-explosive</u> ) → 
Small Arms Rounds	5,700	2,500 * → 
Pyrotechnics	78	5 (signal flares)
Targets	47	6 (floating targets) → 
Sonobuoys	794 (40 explosive)	0
Portable Undersea Training Range (PUTR)	7 (Anchors on Sea Floor)	0; Not Installed

\* (approximate)



# NE 17 Lack of Impacts To Marine Species

## FISH:

- TMAA has minimal overlap with fisheries management areas
- Mid-frequency active sonar not heard by most fish species including key commercial species (e.g. salmon, groundfish) 
- Only a few fish species able to hear sonar (e.g. herring) but not likely to be affected from sonar due to fish's inability to swim at ship speed *and* remain close to bow of ship *for hours* of exposure (no bow-riding fish schools)
- No fish mortality from sonar
- No explosives used in NE17 therefore no fish mortality from explosives



## MARINE MAMMALS:

- Minimum exposure of marine mammals to limited sonar use which would not have significant impacts and below SEIS predictions\*
- No mass strandings associated with Navy; no Navy ship strikes to marine mammals
- 9 years of Navy funded monitoring (2009-2017) shows higher likelihood of more marine mammal species offshore in summer-fall (Jul-Oct) compared to spring-early summer (May-Jun)



**BIRDS:** No impacts to birds from in-water activities; only 3 Navy surface ships in large TMAA ocean area with minimum to no in-air impacts (seabirds not usually associated with Navy ships)

**OTHER:** No fuel spills during 4 Navy ship refuelings at sea; Navy ships retain all plastics onboard; low amount of military expendable material in ocean

\* SEIS marine mammal analysis addressed impacts between entire range from Apr to Oct with quantitative analysis (modeling) for large multi-ship exercise (≥3-5 sonar ships) over a 21 day period



# NE 17 Conclusions

**Minimum exposure or impacts to marine species in GOA TMAA due to short at-sea exercise window (12 days); lower amounts of activity than analyzed in SEIS including only 2 sonar-equipped ships with little active sonar use; no explosive ordnance use; no fuel spills; no reports of mass strandings, no Navy ship strikes, and no indication of public access impacts**

- ❑ **Environmental protection continues as integral part of NE with at-sea training using an extensive set of mitigation measures designed to minimize potential risk to marine life and environment**
- ❑ **Level of activity may fluctuate for each NE exercise but must remain within Alternative (Alt 1) and 2017-2022 MMPA permit limits**
- ❑ **Future NE Exercise timing being considered by USPACOM, ALCOM, and Navy**
  - **Subject to force availability, resource constraints and costs, weather considerations, and larger USPACOM Pacific-wide exercise calendar**





# Questions?



Overall, analysis using best available science shows potential for minimal impacts to individuals of various species, and no long-term individual or population level effects. Minimum NE17 sonar use and no explosive use further reduced already low impact risk.

***We are grateful to the citizens of the state of Alaska for their support as we use the unique training environments in Alaska***

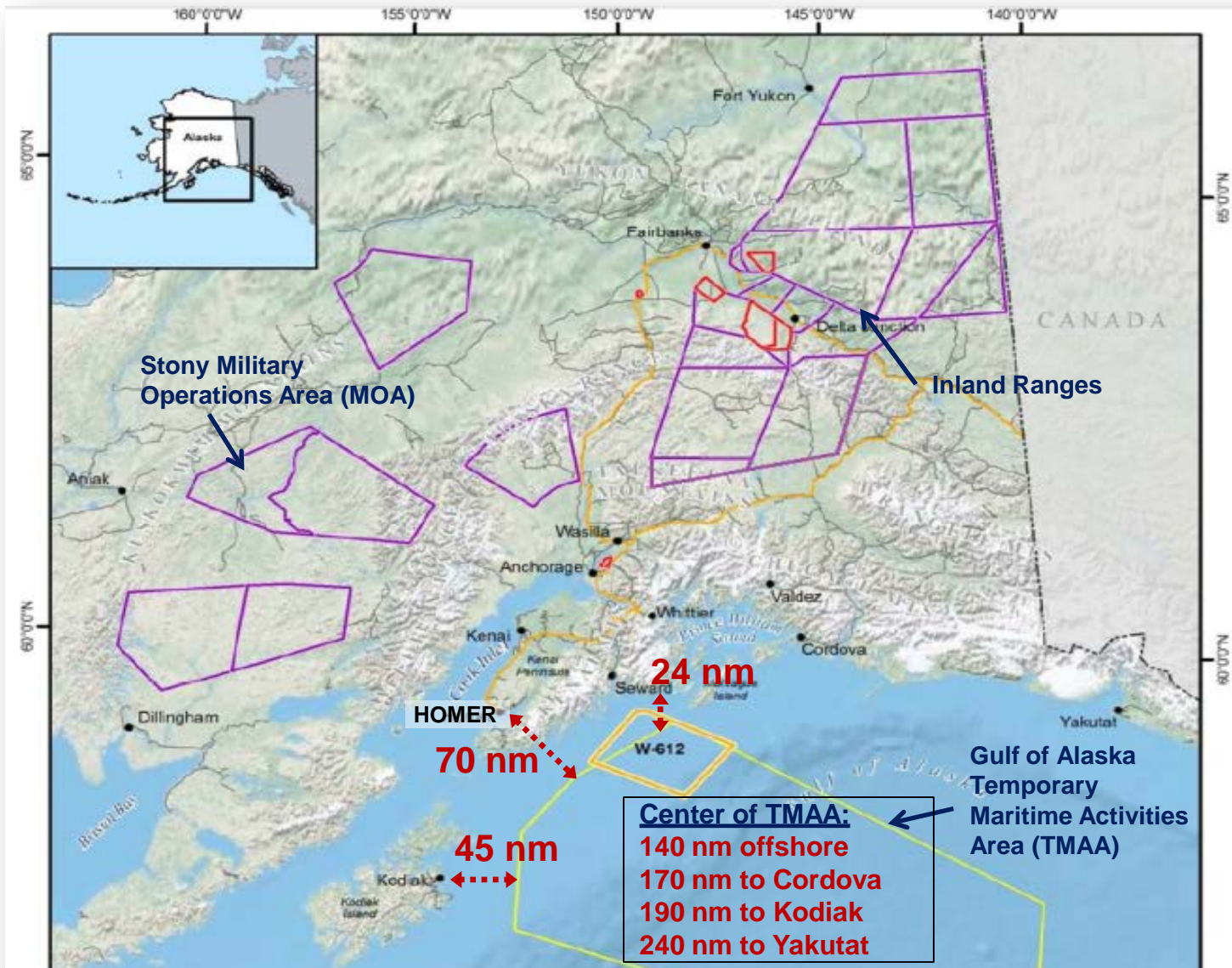


# Back-Up Slides



# Joint Pacific Alaska Range Complex (JPARC)

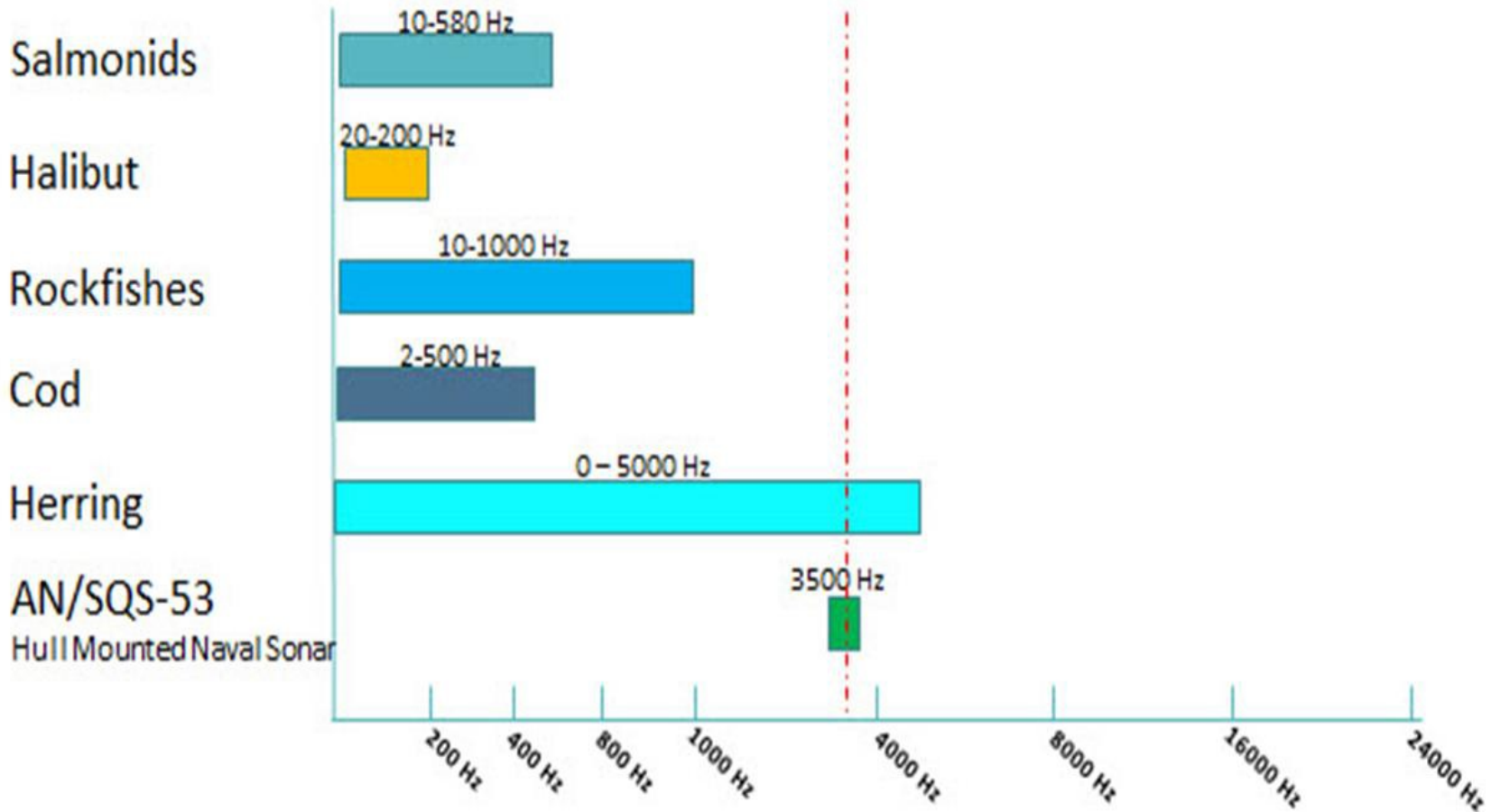
F. Public Comment  
October 2011







# Fish Hearing and Sonar

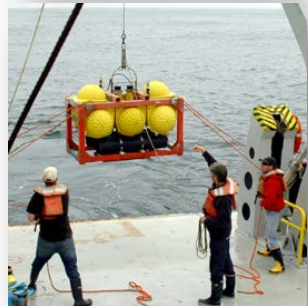


Sources: Astrup 1999; Astrup and Mohl 1993; Hawkins and Johnstone 1978; Jorgensen et al. 2003; Lovell et al. 2003; Mann et al. 2005; Popper 2008; and Popper and Carlson 1998.



# NE17 Marine Mammal Monitoring

Apr 2017 through Sep 2017



Typical HARP configuration (top)  
and example deployment (bottom)  
(Pictures from Scripps Institution of  
Oceanography)

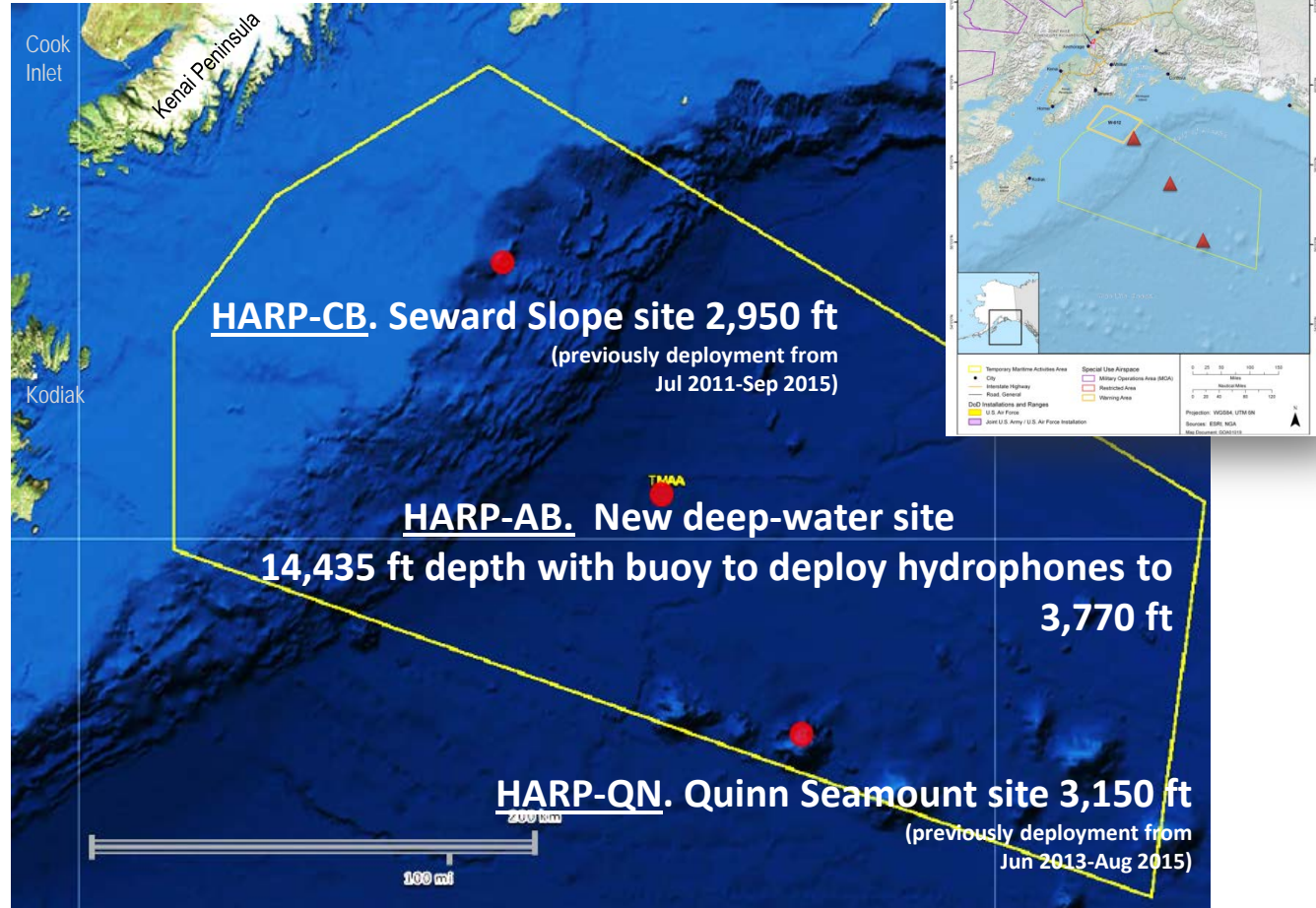


Figure 1. GOA TMAA HARP Deployment Locations (26-30 Apr 2017)



NPFMC comments - NOAA Service Account &lt;npfmc.comments@noaa.gov&gt;

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## comments for subsistence halibut

1 message

Mel & Alana <mlroe@ptialaska.net>  
To: npfmc.comments@noaa.gov

Mon, Sep 25, 2017 at 8:02 PM

# Staff Tasking Request

Dear Chairman Hull and Council members,

My name is Mel Roe and I own and operate Kodiak Island Adventures on Kodiak Island. I was recently talking to another charter operator here in Kodiak and he brought to my attention that it stated in the frequently asked questions on the subsistence halibut web page that only immediate family can accompany us for subsistence fishing on our boats as they are used for charter fishing purposes.

### 10. May I subsistence fish for halibut from a boat registered as a charter vessel?

It depends. You may not hire someone to take you subsistence fishing for halibut. A charter vessel may not be used for subsistence halibut fishing while charter vessel anglers are on board the vessel. However, the owner of a vessel that is registered with the State of Alaska as a charter vessel may use that vessel to harvest subsistence halibut provided the owner has a valid SHARC. Only the vessel owner and members of the vessel owner's immediate family may be on board the vessel while subsistence halibut fishing. Only the vessel owner and members of the vessel owner's immediate family who hold a valid SHARC may fish for subsistence halibut from the charter vessel. (50 CFR 300.66(j))

Throughout the summer we cannot get out to fish as we have clients and it is not legal for us to retain halibut while we have paying clients on the boat. So at the end of our season if a couple of us that both have SHARC cards want to get together and go catch our fish for the year that would not be legal. Why would this only pertain to a charter vessel? If I owned a long liner, seiner, trawler or any other boat it would be legal but because it is a charter vessel it is not? I feel that if I do not have paying clients on board my boat should not be treated any different than any other boat in the harbor. I would ask that this regulation be removed so that I can use my boat just as any other boat owner can without fear of getting a citation. Thank you for your time and consideration.

Mel Roe  
Kodiak Island Adventures





NPFMC comments - NOAA Service Account &lt;npfmc.comments@noaa.gov&gt;

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## Salmon bycatch

1 message

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**Carolyn Nichols** <carenichols@hotmail.com>  
To: NPFMC <npfmc.comments@noaa.gov>

Thu, Sep 21, 2017 at 6:21 AM

I would like to bring to the councils attention that while all the king salmon fisheries in SE Alaska were shutdown in August that the bycatch caps were left untouched. Wild chinook salmon spend part of their lives in the GOA where they are vulnerable to trawl gear in numbers greater than were supposed to be taken in the shut down August troll opening. So the trawl bycatch of King Salmon doesn't damage faltering stocks while directed fisheries catch do? That's a incorrect assumption and needs addressing immediately.

Thank you  
Carolyn Nichols  
111Knutson Dr.

**Testimony to  
NPFMC  
October 2-11, 2017  
Anchorage, Alaska**

My name is Dale Smith, I represent the Native Village of Mekoryuk. Nunivak Island is roughly 30 miles from the mainland in Southwest AK situated between the mouths of the Yukon River and Kuskokwim River. Nunivak Island has only one community called Mekoryuk with approximately 200 people. Coastal Villages Region Fund (CVRF), the regional CDQ group is comprised of twenty (20) communities, and Mekoryuk is one of those communities.

CVRF has operated a subsidiary, Coastal Villages Seafood (CVS) for many years aimed at buying halibut from the regional halibut fishermen. For the past 3 years, CVS opted to suspend halibut operations, thus having detrimental impact on our fishermen and our local economy. This past summer, CVRF had dissolved CVS. Considering this major blow to the halibut fishing communities, we are here today to request a discussion paper to look at the feasibility of Nunivak Island acquiring a separate halibut quota from the area 4E (catch sharing plan).

Please consider the following:

- Establishing a new halibut regulatory area 4(F) Nunivak Island
  - Historic harvest catch from 2002-2012
    - Total harvested by Mekoryuk halibut fishermen was 825,907 lbs.
    - Total harvested at South Nunivak Island (including villages from Toksook Bay, Tununak, Nightmute, Kipnuk, Chefornak) 482,553 lbs.
    - Total Nunivak Island waters (fishermen) harvested 1,308,460 lbs

- Total 4E quota from 2002-2012 was 2,641,903 lbs
- 49.53% was harvested around Nunivak Island waters
- 2008 to 2010 harvest data was not provided by CVRF

All harvest data was compiled from the CVRF website, I had contacted CVRF requesting harvest data from 2008-2010 but no response.

We are specifically asking a percentage from area 4D, possible 20%-30% to be allocated yearly to the newly requested area 4F (Nunivak Island). We understand the area 4E (catch sharing plan) has two CDQ groups that are allocated halibut quotas yearly. We are not deliberately seeking to create negative impacts to 4C and 4E. Considering our circumstances, our request is seeking a continuation to participate in the commercial halibut fishery. Due to our regional CDQ group literally “cutting us off”, we are desperate in our quest to continue commercial halibut fishing as we have since the Bearing Sea Fishermen’s Association days in the 1980’s and early 1990’s.

The Nunivak Island Fishermen’s Group has urged my colleague and I in approaching NPFMC to make for this request. We are not only concerned about the current halibut fishermen, but are concerned about our future fishermen as well. Please consider this request as a plea, for the Nunivak Island Fishermen. Thank for allowing a brief time to express our concerns and request. Quyanal!

North Pacific Fishery Management Council  
605 W. Fourth, Suite-306  
Anchorage, AK 99501

16 August 2017

Ladies and Gentlemen:

I would like to request you make a slight change or clarification to 50 CFR § 679.5(c)(4)(vi)(B). As amended in 2008, “start time” for logging of fishing with trawl gear, is defined as “when the net enters the water”. The previous definition of start time was “when the gear reaches fishing depth”. In researching the history of this change, there appears to be no reason for its being modified except perhaps simplification of the text by using a reference. As far as I can determine from the notes to the proposed and final rules, it wasn’t requested by anyone.

When fishing with bottom gear, “when the gear enters the water” is probably close enough as the time involved in deploying a bottom net is relatively short. However a problem arises with this definition when fishing with midwater gear which takes a long time to deploy, clear, verify opening with sonar and then deploy to fishing depth. Simply winding these long nets into the water takes a long time, and quite often, the net is found to be jammed (a mesh or link being caught in itself or the headrope sonar crooked) and the gear needs to be hauled back onboard and cleared again. It is normal to require fifteen to thirty minutes – from start to finish - just getting the gear wound off the reel and into the water ready for setting, and one hour is quite common. So, the question arises: when does the gear “enter the water”? Is it when the *first* part of the net goes overboard? In this case, the start position and time is highly inaccurate and I would say of little use to researchers or for calculating effort or plotting location. Is it when the *last* part of the net (the doors) enters the water? This would provide a far better start position and time, but if this is the case, the regulation needs clarification from you or from enforcement. I would recommend the start position and time should be when the doors are deployed; at this point an operator is relatively sure the gear is clear and the net is truly ready to begin fishing and the time and distance to spreading the net and fishing is short. Furthermore, this is a concrete event which is easily witnessed and recorded by an observer.

This is not a small matter. True, one could simply take the text of the regulation literally and write down when the codend is first pulled overboard, which would ensure compliance with the letter of the law. However in the long run, this would lead to tens of thousands of hours and miles of inaccuracy in the data and it would be wrong. The regulation was changed in error, the parties who drafted the change did not understand this and I urge you to correct it and notify industry of the same.

Thank you and best regards,

James Cox  
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