Dear Governor Walker, Lt. Governor Malott, Senator Murkowski and Senator Sullivan,

The U.S. Navy has recently stated that it has planned a training event to occur in the Gulf of Alaska from May 1 – 12, 2017. I am concerned about the negative impacts the Navy’s ‘Northern Edge’ combined training exercises could have on the ecosystems in the Gulf of Alaska. As your constituent, I request that you and the State of Alaska encourage the US Navy to take their training exercises further offshore and move the timing of the exercises exclusively to the Fall or before the Spring. While these trainings take place in federal waters, the Navy’s activities could impact State managed resources, such as salmon and other commercially viable species.

There is no question that military preparedness drills are of national importance. However, I am gravely concerned about the risk and potential damage to Alaska’s subsistence, commercial and recreational fisheries, marine habitats, fish and wildlife resources, and regional economies.

The Navy’s existing federal regulatory permits and authorizations expire in May 2016. The Navy is currently seeking re-authorization for its exercises for an additional five years, 2016 – 2021. Presently, the Navy’s area for conducting these training exercises is 20 -24 nautical miles from communities on Kodiak Island, and close to other communities on the South Central Alaskan coast including Cordova, Valdez, Homer, Seward, and Yakutat.

According to the Navy’s Environmental Impact Statement (EIS), these "war games" involve the use of high-frequency and mid-frequency sonar for submarine exercises, plus a variety of live weapons and explosives deployments—bombs, heavy deck guns, torpedoes, missiles, and large carrier strikes, the remains of which will never be recovered. Annually these trainings could leave up to 352,000 lbs of expended and hazardous materials in the waters of the GOA. Hazardous materials may include Cyanide, Chromium, Lead, Tungsten, Nickel, Cadmium, Barium chromate, Chlorides, Phosphorus, Titanium compounds, Lead oxide, Potassium perchlorate, Lead chromate, Ammonium perchlorate, Fulminate of mercury, and Lead azide. The Navy recognizes that fish could mistake expended materials as prey, thus ingesting harmful and lingering toxic substances. Any public or commercial impression that Alaska’s fish may be tainted would be extremely detrimental to Alaska’s commercial fishing industries. This could present additional economic hardships for working Alaskans as we all face the current fiscal crisis.

Since 2004 these exercises have occurred in June during the most prolific breeding and migratory periods of the marine supported life in the region (salmon, whales, birds). In the entire history of Navy trainings in the GOA, no activity has ever occurred in May. The coastline around the GOA is home to many coastal communities and Alaska Native people who rely on marine and freshwater resources for commercial, recreational and subsistence uses. May is an extremely active time for many species with essential habitat in the GOA. The Navy’s EIS indicates that it can meet its training goals during other times of the year (e.g. October), which would be less threatening to Alaskan marine resources than May.

The Navy’s activities area in the GOA includes Essential Fish Habitat for many species of subsistence and commercial fisheries, including those found in Prince William Sound, which has still not fully recovered from the Exxon Valdez oil spill. These waters also support the most sustainable and economically valuable fisheries in the USA. Commercial fishing is the largest private sector employer in Alaska, providing some 63,000 jobs as well as a healthy sustainable food source. Nearly 100% of sockeye salmon in the USA comes from Alaska.

The Navy is asking for authorization to conduct their training exercises without providing any new information regarding the possible impacts these trainings have on fish populations within the GOA. The Navy’s 2011 EIS left many questions unanswered regarding impacts to fish and repeatedly stated that more research is needed. Pursuant to the National Environmental Policy Act, the Navy should have filled in these information gaps before planning additional exercises. Proceeding with trainings before more research is unlawful and puts fish, commercial and subsistence fisheries at unnecessary risk.

If authorized, the Navy is predicting over 182,000 marine mammal takes over the next five years in the GOA. This is too high; this is beyond a negligible impact to these species. Consider the last year the Navy conducted trainings: in 2015 over 30 whales were reported dead in this region. The National Oceanic and Atmospheric Administration has classified this as an ‘unusual mortality event.’ No further explanation as to what caused these deaths has been reported. Many people have expressed concern that the Navy’s activities may be a contributing factor to some of these whale mortalities. Yet, there has been insufficient transparency over Northern Edge ’15 sonar and explosive activities. After repeated documented Freedom of Information Act requests, the Navy is not disclosing locations where its exercises took place nor how long active sonar was used nor the decibel level of sonar used. It has designated the information as classified and thus unavailable to the public.

In March 2015, the U.S. District Court, District of Hawaii, found that the U.S. Navy and the National Marine Fisheries Service violated the law when they failed to meet multiple requirements of the Marine Mammal Protection Act, the Endangered Species Act, and the National Environmental Policy Act when authorizing the Navy’s training and testing activities in the Hawaiian and Southern California ranges. The resulting settlement of that lawsuit means the Navy is now prohibited from using mid-frequency active sonar for training and testing activities in many of the designated biologically important areas in those ranges.

Therefore, I request:

- similar protections enacted for the Hawaiian and Southern California ranges be extended for all marine mammal species of the Gulf of Alaska;

- that the timing of the exercises be moved to a different time of year because the spring and summer months are a critical time for many commercial fishermen and whale species;

- that all trainings taking place within the GOA TMAA (Gulf of Alaska Temporary Maritime Activities Area) and the airspace above the GOA TMAA be moved to the TMAA’s offshore stratum and outside of all the biologically vital seamounts;

- that independent observers accompany all Navy vessels for the duration of any and all training exercise.

I/we are extremely concerned about the potential impact the Navy’s proposed plan may have on Alaska’s fish and wildlife resources, Native subsistence activities, commercial and recreational fisheries and the regional economy. I request that the State of Alaska and its U.S. Senators encourage the Navy to take its exercises further offshore and to the fall.

Thank you,