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February 26, 2019

Adm. Philip S. Davidson, Commander, U.S. Pacific Command  
Camp H.M. Smith, HI 96861-4031  
via Jennifer Kincaid, [jennifer.l.kincaid@pacom.mil](mailto:jennifer.l.kincaid@pacom.mil)

Subj: The Northern Edge 2019 exercise – Requests for your consideration

Dear Admiral Davidson;

Eyak Preservation Council (EPC), based in Cordova, Alaska, has a long-standing interest and record of involvement concerning the Northern Edge training exercises in the Gulf of Alaska.

We are writing to send the following requests regarding the planning and execution of Northern Edge 2019 and Northern Edge 2021. Since the final planning meeting for NE19 is scheduled for February 1 and planning is well underway, we ask for your immediate attention to our requests.

On January 8 we sent a letter similar to this one to Adm. Aquilino (ComPacFleet),<sup>1</sup> in mistaken belief that he has full oversight over Northern Edge planning and execution. We now understand that our letter should have been sent to you, as the commander over both the Pacific Air Forces (where Northern Edge is being planned) and the Pacific Fleet.

***An important observation***

NE19 planners have offered for a carrier strike group (CSG) to participate in NE19. EPC does not know the maximum number of naval vessels being contemplated for the exercise.

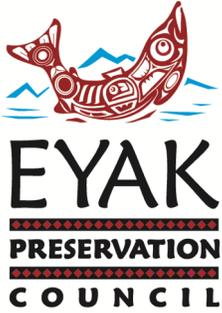
We request that the planning decisions recognize and follow limitations on the maximum number of vessels that are specified in the 2011 Northern Edge FEIS<sup>2</sup> and in the Navy's Jan. 24, 2011 response to the comments which the National Marine Fisheries Service made on the Navy's 2010 Effective Fish Habitat Assessment for Northern Edge.

In the sections of the FEIS where a statement of the maximum number of vessels would ordinarily be expected, disclosure of the limitations is absent. Those sections are for example the statement of Purpose and Need, the comparison of alternatives in Chapter 2, or the General Approach to Analysis in Chapter 3. Nonetheless, in obscure locations the FEIS does include important disclosures of the maximum number of naval vessels. For your benefit and consideration, those disclosures are listed here (all emphasis is added; EPC's commentary is in brackets; and parenthetical phrases are original):

1. FEIS at 2-14: The FEIS refers to participation of "a complete Navy Carrier Strike Group (CSG), comprised of an aircraft carrier and several other combatant surface ships." [The FEIS does not define what a "complete" CSG is. For quantification of what is proposed, one must look for related statements in the FEIS.]
2. A generalized statement in FEIS at 3.6-42: "No Action Alternative, the number of Navy vessels operating during training activities varies, but generally includes **up to seven surface ships and one submarine** (collectively referred to as vessels)." [The description of the no action alternative in the FEIS contains no such statistics.]
3. FEIS at 3.7-10: "The number of Navy vessels participating in training under the No Action Alternative is 23, **consisting of 4 military vessels** and up to 19 contracted vessels and boats." [Note that this contradicts the statement at 3.6-42 for

<sup>1</sup> We have yet to receive a reply from Adm. Aquilino.

<sup>2</sup> The 2016 Supplemental EIS does not have content relevant to the matter.



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the same alternative, but is affirmed by the statement at 3.8-134 for the increase and total under Alternative 1.]

4. FEIS at 3.8-134: "Under Alternative 1 [the selected alternative], the number of Navy vessels would increase by four (three surface vessels and one submarine) for a **total of eight Navy vessels**, a 50 percent increase over the No Action Alternative. This increase would include both training and transit activities for Alternative 1. Contracted support vessels would remain at 19."

Importantly, the 2017 Record of Decision and the 2016 Supplemental EIS say nothing about the number of ships, and therefore rely on the above disclosures in the FEIS.

Our conclusion is that a maximum of 8 military vessels (consisting of up to six surface ships and up to two submarines) is authorized for Northern Edge, through the 2017 Record of Decision and the NEPA process which concluded in 2016. Including a larger number of naval vessels in the exercise would require a supplemental EIS.

### ***Requests concerning the number of military vessels in NE19 and NE21***

Since April, Eyak Preservation Council has reviewed all available information concerning the potential impacts of Northern Edge exercises.

We have concluded that there is no good time of year to conduct these exercises since important fish and wildlife resources are present in the area throughout the year, nor from a fish and wildlife resources perspective is there any good place within the Temporary Marine Activity Area for the exercises. This makes limiting the scale and nature of the exercises highly important. Accordingly, we request that you take the following actions regarding NE19 and NE21:

1. Ensure that the Northern Edge planners are aware of the above maximums for the numbers of participating military vessels, and that they are directed to adhere to them. These are maximums authorized under NEPA and by the ROD.
2. Direct the planners of NE19 and NE21, as well as the authorities who will conduct them, to keep the number of military vessels at or below the number used in NE15 or NE17, and to restrict the use of bombs, missiles and munitions to the numbers and kinds used in those exercises.<sup>3</sup>
3. Direct that NE19 and NE21 no operations be conducted within 20 nm of any seamount, whether designated or undesignated.<sup>4</sup>

We await your reply. Please communicate via my email address below.

Thank you.

Sincerely,

Carol Hoover, Executive Director  
Eyak Preservation Council

[carol@redzone.org](mailto:carol@redzone.org)

cc: Senator Lisa Murkowski

Capt. Jeffrey Anderson, ComPaCom Exec. Assistant ([jeffrey.t.anderson@pacom.mil](mailto:jeffrey.t.anderson@pacom.mil).)

Larry Edwards, Eyak Preservation Council ([Larry@LTEdwards.com](mailto:Larry@LTEdwards.com))

<sup>3</sup> According to public records, in NE15 there were three destroyers and one submarine. In NE17 there were two destroyers, one supply ship and two USCG cutters. Live munitions were not used.

<sup>4</sup> The National Marine Fisheries Service has noted that only some of the important sea mounts have been designated for protection, to date.