



Sun'aq Tribe of Kodiak

February 16, 2020

Naval Facilities Engineering Command Northwest
Attention: GOA Supplemental EIS/OEIS Project Manager
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

To Whom It May Concern:

Thank you for the opportunity to comment on the draft Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) prepared by the U.S. Navy (the Navy) to evaluate potential environmental impacts from the proposed Northern Edge exercises (Northern Edge).

Sun'aq Tribe of Kodiak (STK) is providing this letter to communicate our grave concerns with this training, and in particular, that the Navy has remained reliant on past Environmental Assessments (EAs) and EISs/OEISs that are incomplete. Nor have they adequately addressed or mitigated concerns we have raised on repeated occasions. As we have stated during numerous Government-to-Government consultations, public comment periods, and at public presentations, there are substantial and significant questions about whether your actions, and the actions of other parties related to this training will have detrimental impacts of any type or magnitude on natural resources and our cultural resources.

First and foremost, we appreciate the opportunity to provide comments to the Navy regarding protecting our marine resources, however we do not feel we have been given adequate time to engage in truly meaningful dialogue or consultation between our Tribal Council and the Navy in this matter. Therefore, future comment periods must include enough time to thoroughly review proposed EIS/OEIS supporting documents to enable constructive evaluations and feedback. These federal actions should always initiate formal Government-to-Government consultation offers with impacted Tribal Governments. Therefore, we feel that the Navy is negligent in meeting their tribal trust responsibility regarding both Northern Edge 2021, and the proposed Final Supplemental EIS/OEIS.

Alutiiq People were the original stewards of lands, waters, and resources bordering the Gulf of Alaska before the arrival of the Russians, the Americans, and the creation of the State of Alaska. With over 1,800 citizens, Sun'aq Tribe of Kodiak represents the largest Native community in the western Gulf of Alaska. We are very concerned about the lands, waters, air and other natural resources that helped sustain our ancestors, and now for the people of today, who continue to rely on the same resources for economic support, subsistence, and cultural identity – of which the health and vitality of marine and terrestrial resources are an essential cultural component.

On July 6, 2016, STK hosted a formal Government-to-Government consultation between the Navy's Pacific Fleet, Alaskan Command, the U.S. Coast Guard Base Kodiak (as invited observer) and four of the largest federally-recognized Alutiiq Tribes in the western Gulf of Alaska. Tribes in attendance included: Native Village of Afognak, Native Village of Ouzinkie, Tangirnaq Native Village, and Sun'aq Tribe of Kodiak. At this meeting, STK presented a list of requirements to the Navy for continued Gulf of Alaska training activities. The requirements included:

312 West Marine Way
Kodiak, Alaska 99615
Phone: 907.486.4449
Fax: 907.486.3361



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- a. Navy partner with Tribe, Federal, State, and other organizations to help provide "take" (or catch rate) biomass data of important indicator species, as if Navy training activities/sonar operations/release of "expended materials" were similar to subsistence, sport, or commercial fishing activities and related. Research and report similar for avian species.
- b. Reschedule Northern Edge exercise dates to late fall/early winter months, and partition exercises to particular sectors of the "TMAA" when least potential for adverse impacts to marine food chain species occurs, and in particular, to avoid migration routes of key species such as whales and salmon.
- c. Until more is known about potential for adverse impacts to migratory and resident fish and birds that tend to hold to coastlines and off-shore canyons, or areas designated as "Essential Fish Habitat," move exercises further off-shore into/over deeper waters, off the continental shelf. Proof of "no adverse impacts" by Navy exercises is verified by data obtained and tracked over time in item "a." described above.
- d. Move exercises away from locally-important Portlock Bank, its canyons, and deep ocean seamounts for similar reasons explained in item "c." above.
- e. No aviation or marine vessel fuel discharges over water to lessen adverse impacts to avian species and shallow-swimming biota (unless emergency). Report all discharge events.
- f. Adopt seasonal marine mammal and other protections as granted to "Biologically Important Areas" in new rules set for Navy training ranges in Hawaii and Southern California; Also relates in part to item "b." above.
- g. Similar to nearly all commercial fisheries, maintain complete and 3rd party Observer coverage.
- h. The Navy agrees to work harder to build trust among all Kodiak citizens (and throughout the GOA). In just decades, misunderstood or the unintentional consequences of Navy's training activities could adversely impact a culture that has survived in one place for thousands of years.
- i. Items on this list shall be addressed in Navy's GOA "Final SOEIS" and subsequent environmental documents until resolved to our respective Tribal Councils' satisfaction.

NOTE: As a result of the July 6, 2016 formal Government-to-Government consultation, the Navy agreed to prohibit explosives training over Portlock Bank (requirement "d"). Sun'aq Tribe and other participating Tribes gratefully acknowledge the Navy for eliminating explosives in this biologically important area. In addition, we commend the Navy for establishing the North Pacific Right Whale Cautionary Area during summer feeding months.

Never-the-less, most of the 2016 "List" items remain unaddressed. The "List" items still remain as valid as they did in 2016.

To assist Navy planners in completing the new Supplemental EIS/OEIS, we provide the following observations and recommendations:

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As specified in requirement "I", STK wishes that all items on the List be addressed in the 2020 Gulf of Alaska Navy Training Activities Supplemental EIS/OEIS and subsequent environmental documents. Current Northern Edge training activities occur during critical timing for migrations of fish and marine mammals in the Gulf of Alaska. The Gulf of Alaska encompasses 592,000 square miles and includes the Temporary Maritime Activities Area (TMAA), a large area where 300 fish species, 147 species of birds, and 26 species of marine mammals reside.

Biological research and monitoring efforts are needed to ensure there are no long-term impacts on the health and population statuses of fish, marine mammals, and seabirds (live, injured, and dead). Monitoring during the two-week Northern Edge exercise is not sufficient and STK requests that the Navy include a long-term monitoring plan within the Gulf of Alaska Navy Training Activities Supplemental EIS/OEIS. Research is needed on the following topics and should be addressed in the document:

- To restate requirement "a." of the List, Navy planners should estimate their "take" of a particular species, and then express that as a proportion of the total take, or the most salient take;
 - For example, if the Northern Edge training activity (including all military and classified activity) is estimated to kill 2 gray whales a year and 8 others are killed by other human activities, then planners would state in the SOEIS that training activities are predicted to cause 20% of the human-caused whale mortality in a given year
 - The same proportional estimates should be made for all avian and marine species, especially noting estimates made for commercial fish species
- Salmon migration routes/areas utilized for migration within the Gulf of Alaska
 - In the current EIS, Section 3.6 states that "of the five [sic] Pacific salmon species, Chinook would be the most affected by the Navy's trainings", but the document doesn't state why, i.e.;
 - Why have Chinook salmon returns been so low? Research is needed on low returns and impacts to Chinook salmon resulting from the Northern Edge training activities
 - Additionally, the document should instead note that there are five Pacific salmon species known to frequent these impacted waters, and the sixth Pacific salmon species of the northwestern Pacific (*masu* salmon) likely does not occur in the impacted area
 - Pacific herring hearing/lateral line system
 - The EIS shows research results of Atlantic herring hearing and how they are the only species which hearing overlaps with sonar frequency
 - Herring are a significantly important prey fish for many species in the Gulf of Alaska
 - Research and documentation are needed on how sonar influences Pacific herring hearing and associated mortality
 - Accumulation of metals and toxins within the TMAA
 - The TMAA is important habitat for shellfish and 59 managed groundfish species
 - Do shellfish and groundfish species within the TMAA bioaccumulate metals and toxins from the expended materials from Northern Edge?
 - Research and long-term monitoring on metals and toxins is needed on the impacts to species residing in the TMAA

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- Missile Defense Agency openly admits to use of the TMAA when testing anti-ballistic missile systems launched from the Alaska Aerospace Corporation-operated space port on Kodiak Island or off-shore locations, but it is not declared as a “TMAA” when utilized for their purposes;
 - Acknowledge and calculate cumulative impacts from related Defense Department-sponsored activities such as those related to splash down of missile and rocket debris or other hazardous materials within the TMAA
 - Complete an Environmental Justice assessment of economic losses from cumulative impacts

These research and monitoring projects could be based at the Kodiak Seafood and Marine Science Center, which focuses on seafood safety, seafood quality, bycatch reduction, product markets/development, and marine foods sustainability. Basing long-term research and monitoring efforts out of the community of Kodiak would make economic and logistic sense, and demonstrate the Navy’s commitment to understanding the marine environment and protecting its rich marine resources.

The Gulf of Alaska is an extremely productive area that provides the foundation supporting all our needs. Sun’aq Tribal citizens and ancestors have relied on the marine resources from the Gulf of Alaska for thousands of years. To ensure the well-being of future generations of Alutiiq and other Indigenous people, maintaining the health of marine resources in our communities is vital both economically and culturally. Sun’aq Tribe of Kodiak appreciates the opportunity to provide comments during the scoping period.

For Sun’aq Tribe of Kodiak
Very respectfully,

Nina Gronn
Tribal Council Chair
Sun’aq Tribe of Kodiak

Jeannine Marsh
Tribal Administrator
Sun’aq Tribe of Kodiak

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