

Appendix N
Draft EIS Comments and Responses

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ACRONYMS AND ABBREVIATIONS

AGL	above ground level
ALCOM	Alaskan Command
AQ	Air Quality
AS	Airspace Management
BAX	Battle Area Complex
BR	Biological Resources
CFR	Code of Federal Regulations
CI	Cumulative Impacts
CR	Cultural Resources
DO	Description of Proposed Action and Alternatives
EIS	Environmental Impact Statement
EJ	Environmental Justice
G	Government comments
GA or GB	General Comment
HW	Hazardous Materials
I	Individual (citizen) comments
IT	Infrastructure and Transportation
LA	Land Use/Public Access
LM	Land Use/Management
LR	Land Use/Recreation
MOAs	Military Operations Area
MT	Mitigations
N	Non-government comments
NEPA	National Environmental Policy Act
NO	Noise
NP	NEPA Process
PN	Purpose and Need
PR	Physical Resources
SA	Safety (Airspace)
SB	Subsistence
SE	Socioeconomics
SG	Safety (Ground)
SUA	Special Use Airspace
T	Tribal comments
WR	Water Resources

APPENDIX N DRAFT EIS COMMENTS AND RESPONSES

N.1 PUBLIC AND AGENCY COMMENT SUMMARY

This section contains comments received from Alaska Native Tribes, Federal, State, and local agencies, and the public, during the public comment period for the draft Environmental Impact Statement (EIS). In accordance with the National Environmental Policy Act (NEPA), Alaskan Command (ALCOM) reviewed public and agency comments and incorporated new information, as appropriate, into the final EIS. ALCOM encouraged public comments in direct mailings to the project mailing list, newspaper advertisements, press releases, and flyers, as well as during public hearings held in the month of May 2012.

During the draft EIS review period that extended from March 30 to July 9, 2012, ALCOM received a total of 266 comment submittals. [Table N-1](#) displays the source of the comment submittals and [Table N-2](#) displays the approximate numbers for the formats in which the comments were received. These numbers are approximate as duplicate comments may have been submitted via multiple methods (i.e., mail, email, fax, website). These duplicate comments may have been consolidated, if the commenter was the same, so only one form of delivery was counted.

Table N-1. Summary of Comment Submittal Source

Government	27
Non-Government	48
Alaska Native Tribes	2
Individual Citizen	189
Total Public Comments Received (original submittals)	266

Table N-2. Summary of Comment Submittal Format

Public Hearing Written Comment	11
Public Hearing Testimony	61
Mail	26
Email	65
Website Submittal	98
Phone	2
Fax	3
Total Public Comments Received (original submittals)	266

ALCOM took public and agency comments into consideration in its decisionmaking process regarding preferred alternatives and mitigations and will continue to do so throughout the environmental impact analysis process. These decisions will be announced in the Record of Decision following the publication of the final EIS. To evaluate the comments, ALCOM subdivided the 266 comment submittals into 1,361 independent comments, categorized by

resource area. [Table N-3](#) identifies the resource areas and breaks out the number of individual comments by resource area.

The majority of the comments focused on proposed mitigations for airspace management and landuse. Specifically, the actions and topics of greatest concern include the proposed Fox 3 and Paxon Military Operations Areas (MOAs); the proposed lowering of the Special Use Airspace (SUA) to 500 feet above ground level (AGL); and related impacts on civil aviation, residents, recreation, hunting, wildlife, subsistence activities, the tourism industry, and commercial aviation access. Safety concerns mainly focus on airspace conflicts below 5,000 feet AGL, particularly the mix of high-speed aircraft and small, low-speed general aviation aircraft.

Table N-3. Response Code Guide for Response to Comments on Draft EIS

Response Code	Resource Area or Comment Topic	Number of Comments per Resource Area
AQ	Air Quality	7
AS	Airspace Management	160
BR	Biological Resources	96
CI	Cumulative Impacts	26
CR	Cultural Resources	12
DO	Description of Proposed Action and Alternatives	62
EJ	Environmental Justice	4
GA or GB	General Comment	254
HW	Hazardous Materials	7
IT	Infrastructure and Transportation	3
LA	Land Use/Public Access	37
LM	Land Use/Management	46
LR	Land Use/Recreation	71
MT	Mitigations	171
NO	Noise	42
NP	NEPA Process	46
PN	Purpose and Need	74
PR	Physical Resources	4
SA	Safety (Airspace)	67
SB	Subsistence	63
SE	Socioeconomics	77
SG	Safety (Ground)	25
WR	Water Resources	7
Total		1,361

Among other concerns are the potential dangers posed by hazardous waste, in particular unexploded ordnance and its potential for closing off access to public lands; proposed airspace restrictions over the Battle Area Complex (BAX) and Isabel Pass; and the potential for negative impact of the proposals on the populations closest to the highly used, road-accessible Alaskan beltway. Tourism is prominent among socioeconomic concerns; several commenters requested that training exercises avoid the summer and fall season due to the tourism traffic during those times of year. Of additional concern are potential impacts on personal freedoms; fundamental Alaskan values, notably including solitude and peace and quiet; and the use of nature for recreation as well as subsistence.

Copies of submitted comments are contained in the section titled [N.2](#) Public and Agency Comments. The following presents the comment and response process.

N.1.1 Public/Agency Comment Identification Guide

The paragraphs below outline the organization of comments, how ALCOM reviewed comments, and how commenters can find responses to their comments.

N.1.1.1 Comment Receipt and Review

Comment Receipt: Comments on the draft EIS included both written correspondence and oral testimony received during the public comment period. ALCOM assigned each comment a Comment Identification Number. All comments are included under the section titled [N.2](#) Public and Agency Comments. The comment submittals are printed in numerical order, by Comment Identification Number and are organized into four sections:

- Government agency comments: Comment Identification Numbers G0001 through G0028; G0023 was removed as the identical comment had been submitted via email and mail and it was duplicative.
- Alaska Native comments: Comment Identification Number T0001 through T0002
- Non-government comments: Comment Identification Numbers N0001 through N0049; N0028 was removed as the commenter running a test of the website
- Individual comments: Comment Identification Numbers I0001 through I0089

Comment Review: In accordance with 40 Code of Federal Regulations (CFR) 1503.4, ALCOM assessed and considered comments as follows.

Project personnel read and reviewed each comment letter or oral testimony carefully, and then identified and assigned comment categories to substantive comments within each comment letter or testimony. The reviewers utilized three guidelines for determining substantive comments:

- The comment questioned the Proposed Action, alternatives, or other components of the proposal.
- The comment questioned the methodology of the analysis or results.
- The comment questioned the use, adequacy, or accuracy of data.

Environmental resource specialists reviewed the comments. The resource specialists assigned a response number to each substantive comment. Response numbers are located in the section titled [N.3 Government Responses to Comments](#) in [Table N-5](#). A guide to the coding of the response numbers is in [Table N-4](#).

N.1.1.2 Locating Comments

The directory of commenters appearing in [Table N-4](#) presents the names of all commenters alphabetically by first, name of the organization (or “Private Citizen”), then last name. Each commenter can locate his/her name in this directory. As noted on the public displays, sign-in and comment sheets, providing names during the public comment process meant that each commenter understood that his/her name and comment would be made a part of the public record for this EIS. Each comment is assigned a Comment Identification Number. This is a number that was assigned to each comment form or oral testimony and is stamped on the letter or next to transcripts of oral comments. All verbal and oral comments are organized numerically by the Comment Identification Number in the next section, titled “Public/Agency Comments.”

N.1.1.3 Locating Responses to Comments

Army and Air Force responses to comments are contained in the section title [N.3 Government Responses to Comments](#). All responses are ordered by Comment Identification Number. To locate the response, the commenter should first locate the Comment Identification number in the left column. All responses for each comment letter are listed to the right, alphabetically. Each response is designed to be read along with the bracketed comment it addresses. Assistance with acronyms can be found at the front of the EIS.

Public and agency involvement is an important part of the NEPA process, and all comments are taken into consideration by the ALCOM in its decision making process. ALCOM would like to express appreciation for all comments. Many of the comments express the views and opinions of the commenters. Such comments do not require a specific response, but are included as part of the public input and are taken into consideration in the decision making process. The fact that a change in the proposed actions or the EIS analysis did not occur for a comment does not in any way reduce the value of anyone’s participation.

Table N-4. Directory of Comments

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Ahtna Incorporated	Martin, Kathryn	N0033-1 to N0033-27, N0033b-1 to N0033b-34, N0033c-1, N0033c-2
Aircraft Owners and Pilots Association (AOPA)	McCaffrey, Melissa	N0026-1 to N0026-28
Aircraft Owners and Pilots Association (AOPA)	Williams, Heidi J.	N0004-1, N0018-1
Alaska Airlines	Baker, Steve	N0043-1
Alaska Airman’s Association	White, Adam	N0017-1, N0017-2, N0041-2, N0041-3, N0041-4
Alaska Airports Association	Dale, Jane	N0046-1 to N0046-30
Alaska Department of Fish and Game	Fleener, Craig L.	G0022-1 to G0022-52
Alaska Department of Natural Resources - Division of Forestry	Mullen, Gary	G0010-1, G0010-2

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Alaska Department of Natural Resources - Division of Mining, Land and Water	Goodrum, Brent	G0014-1 to G0014-18
Alaska Department of Natural Resources - Office of Project Management and Permitting	Steele, Marie	G0024-1 to G0024-5
Alaska Department of Transportation	Hatter, Steven D.	G0018-1, G0018-2
Alaska Miners Association	Crockett, Deantha	N0030-1 to N0030-8
Alaska Outdoor Council	Arno, Rodney	N0031-1 to N0031-8
Alaska Quiet Rights Coalition (AQRC)	Hatton, Elizabeth	N0025-1 to N0025-16
Alaska Railroad Corporation	Leary, Linda	N0024-1
Alaska Survival	Long, Becky	N0027-1 to N0027-19
Alaskan Aviation Safety Foundation	Siebe, Carl	N0001-1, N0042-1 to N0042-4
Amber Lake North Homeowner's Association	Olson, Dana L.	N0022-1 to N0022-5
Chickaloon Village, Traditional Council (Nay'dini'aa' Na')	Wade, Doug	T0001-1 to T0001-5
Citizens' Advisory Commission on Federal Areas	Leaphart, Stan	G0026-1 to G0026-15
City of Delta Junction	Guess & Rudd P.C.; DeWitt, James D.	G0019-1
City of Delta Junction	Leith, Mary	G0007-1 to G0007-4
City of North Pole	Isaacson, Mayor Douglas W.	G0016-1 to G0016-9
City of Wasilla	Rupright, Verne	G0003-1, G0003-2, G0003-3
Coalition for Susitna Dam Alternatives (CSDA)	Board of Directors, Coalition for Susitna Dam Alternatives	N0038-1
Cook Inlet Region, Incorporated	Razo, Gregory	N0002-1 to N0002-6
Copper Basin Fish and Game Advisory Committee	McMahan, Charles	G0011-1
Copper Country Alliance	McHenry, Ruth	N0007-1, N0007-2, N0007-3, N0035-1 to N0035-12, N0050-1
Copper Valley Air Service; other air taxis	Parmenter, David	N0006-1, N0006-2, N0006-3
Delta Sportsman's Assn & ADF&G Advisory Committee	Aiton, Vern	N0003-1, N0003-2
Denali Air	McGregor, Dan	N0016-1, N0016-2, N0016-3
Denali Borough	Asbury, Terry	G0028-1, G0028-2
Denali Borough	Pieknik, Gail; Talerico, David M.	G0012-1
Denali Citizen Council	Ragland, Hannah	N0048-1 to N0048-29
EPA Region 10 - Environmental Review and Sediments Management Unit	Reichgott, Christine B.	G0027-1 to G0027-29
Experimental Aircraft Association (EAA)	Hansen, Randy	N0040-1, N0040-2, N0040-3
Fairbanks International Airport Operators Council (AOC)	Christian, Cory	N0032-1 to N0032-5
Fairbanks North Star Borough	Hopkins, Mayor Luke T.	G0004-1, G0017-1 to G0017-30, G0017-31
Fairbanks North Star Borough; City of Anchorage; City of Fairbanks; City of North Pole	Hopkins, Mayor Luke T.; Sullivan, Mayor Dan; Cleworth, Mayor Jerry; Isaacson, Mayor Douglas W.	G0002-1, G0002-2, G0008-1
Federal Aviation Administration (FAA)	Cruz, Michele L.; Henry, Robert; Warner, John	G0025-1 to G0025-4
Fish and Game Board, Central, AK	Glanz, William L.	N0036-1 to N0036-4
General Aviation Association of Fairbanks International Airport	Hussey, Arthur	N0029-1, N0029-2, N0029-3

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Greater Fairbanks Chamber of Commerce (GFCC)	Herbert, Lisa; Lundgren, Steve; Shaw, Lorna	N0019-1, N0049-1, N0049-2
Gulkana Hatchery	Catledge, Lucas	N0009-1
Gulkana Hatchery	Martinek, Gary	N0008-1, N0008-2
House District 12	Feige, Representative Eric	G0006-1, G0006-2
Kingdom Air Corps	King, Dwayne	N0023-1 to N0023-4
Knik Tribal Council	Call, Debra	T0002-1 to T0002-4
Lake Louise Lodge	Delaquito, John	N0005-1 to N0005-4
Lake Louise Non-Profit Corp. (LLCNPC)	Matthews, Beverly	N0020-1 to N0020-5
Matanuska Susitna Borough	DeVilbiss, Larry	G0020-1 to G0020-17
Matanuska Susitna Borough	Krueger, Emerson	G0001-1
National Outdoor Leadership School	Hutchins, Janeen	N0044-1 to N0044-14
National Park Service, Alaska Regional Office	Cellarius, Barbara A.; Hunter, Paul	G0013-1, G0013-2, G0013-3
Northern Alaska Environmental Center (NAEC)	Hertz, Jenna; Miller, Pamela A.	N0039-1 to N0039-51
on behalf of the Alaska Mental Health Trust Authority by the Trust Land Office (TLO)	Jones, Greg	G0009-1 to G0009-5
Paxson Fish and Game Advisory Committee	Schandelmeier, John	N0011-1, N0011-2, N0011-3, N0014-1, N0014-2
Paxson Lodge	Peterson, Tony	N0010-1, N0010-3 to N0010-6, N0012-1, N0013-1
Pico Aviation	Lowe, Barney	N0021-1
Private Citizen	Alcott, Gary	I0060-1, I0060-2
Private Citizen	Ameen, Rasool	I0078-1 to I0078-4, I0079-1 to I0079-4
Private Citizen	Anderson, Curt	I0087-1 to I0087-7
Private Citizen	Anderson, Travis	I0114-1
Private Citizen	Arno, Rod	I0023-1, I0023-2, I0023-3
Private Citizen	Baggett, Cody	I0105-1
Private Citizen	Bakewell, Audubon	I0059-1
Private Citizen	Barrette, Al	I0070-1
Private Citizen	Barrette, Allen F.	I0157-1 to I0157-12, I0183-1 to I0183-12
Private Citizen	Bartlett, Jane L.; Bartlett, Mark A.	I0011-1, I0011-2
Private Citizen	Bartlett, Mark	I0115-1
Private Citizen	Beck, Lewis	I0143-1, I0143-2
Private Citizen	Beckley, John	I0041-1, I0041-2
Private Citizen	Berg, Timothy	I0133-1, I0133-2
Private Citizen	Bertholl, Dwayne	I0055-1, I0099-1 to I0099-6
Private Citizen	Billington, Donnie	I0043-1 to I0043-11
Private Citizen	Billman, Danny	I0095-1
Private Citizen	Binggeli, Mark	I0144-1, I0144-2
Private Citizen	Braund, Tom	I0052-1
Private Citizen	Brocke, Deborah	I0102-1, I0102-2, I0102-3
Private Citizen	Brown, John	I0147-1, I0147-2
Private Citizen	Burgess, Bill	I0125-1, I0125-2
Private Citizen	Byers, Maurice	I0118-1
Private Citizen	Cartee, Terry	I0015-1, I0015-2, I0138-1 to I0138-4
Private Citizen	Cassara, Nick	I0124-1 to I0124-5
Private Citizen	Catalone, Chris	I0155-1, I0155-2, I0155-3
Private Citizen	Cellarius, Barbara	I0164-1 to I0164-10
Private Citizen	Chambrone, Maureen	I0169-1, I0169-2, I0169-4, I0169-5, I0169-6

Table N-1. Directory of Comments (*continued*)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Private Citizen	Chesney, Scott	I0137-1, I0137-2
Private Citizen	Chythlook, Franklin	I0037-1, I0037-2, I0037-3
Private Citizen	Cook, Eli	I0188-1
Private Citizen	Cook, John P.	I0158-1
Private Citizen	Cooper, Matthew	I0112-1
Private Citizen	Corcoran, Mary	I0096-1 to I0096-12
Private Citizen	Corle, Gary L.	I0046-1 to I0046-5, I0130-1 to I0130-8
Private Citizen	Cross, Jay	I0126-1
Private Citizen	Dansby, Mike	I0062-1, I0062-2
Private Citizen	Davidson, George	I0001-1 to I0001-4
Private Citizen	Dickens, John	I0048-1
Private Citizen	Dittrick, Bob	I0026-1, I0026-2
Private Citizen	Eklund, Janelle	I0117-1 to I0117-5
Private Citizen	English, Maureen	I0146-1 to I0146-5
Private Citizen	Farrar, Diana	I0040-1 to I0040-4, I0068-1, I0068-2, I0068-3
Private Citizen	Folsom, Bill	I0021-1 to I0021-5, I0033-1, I0033-3 to I0033-7
Private Citizen	Foster, Peg	I0047-1
Private Citizen	Fread, Beth	I0045-1
Private Citizen	Frey, Bill	I0083-1
Private Citizen	Garrett, Don	I0007-1, I0113-1, I0113-2
Private Citizen	Gastrock, Robert	I0156-1, I0156-2, I0156-3
Private Citizen	Gatzke, Thomas	I0108-1
Private Citizen	Gay, Harry	I0053-1, I0053-2
Private Citizen	Gerlach, Robert	I0091-1 to I0091-9
Private Citizen	Gerwig, Joe	I0036-1, I0036-2, I0036-3
Private Citizen	Gilman, Orville	I0084-1, I0084-2, I0084-3
Private Citizen	Godduhn, Anna	I0071-1, I0071-2, I0071-3
Private Citizen	Graham, Robert	I0080-1
Private Citizen	Gray, Rex	I0176-1
Private Citizen	Harlan, Brian	I0148-1 to I0148-4
Private Citizen	Harris, Jay	I0069-1
Private Citizen	Harris, John	I0076-1
Private Citizen	Hartman, Jean	I0097-2 to I0097-5
Private Citizen	Herman, Dianne	I0010-1
Private Citizen	Hester, John	I0136-1, I0136-2
Private Citizen	Heusser, Heather	I0049-1, I0049-2, I0049-3
Private Citizen	Hicks, Whit	I0039-1 to I0039-14, I0064-1
Private Citizen	Hobson, George	I0167-1
Private Citizen	Hodel, Chris	I0154-1, I0154-2
Private Citizen	Holt, Harry; Holt, Jean	I0093-1 to I0093-4
Private Citizen	Holt, Jean	I0028-1, I0028-2, I0032-1, I0032-2
Private Citizen	Hurlburt IV, Ward	I0160-1, I0160-2
Private Citizen	Hutchins, Jeanine	I0034-1 to I0034-5
Private Citizen	Johnston, David	I0100-1 to I0100-4
Private Citizen	Kalakias, Deborah	I0014-1, I0014-2
Private Citizen	Kehoe, Sarah	I0104-1 to I0104-4
Private Citizen	Keizer, Terry	I0042-1 to I0042-6
Private Citizen	Kelly, Robert	I0145-1

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Private Citizen	Kendall, Paul D.	I0016-1, I0016-2, I0017-1, I0017-2
Private Citizen	Koskovich, Michael	I0165-1, I0165-2
Private Citizen	Kreger, Ann	I0030-1, I0030-2
Private Citizen	Kreger, Frank	I0027-1, I0027-2
Private Citizen	Lamal, Tom	I0073-1, I0073-2
Private Citizen	Long, Becky	I0139-1 to I0139-12
Private Citizen	Lopez, Guy	I0151-1, I0151-2
Private Citizen	MacCallum, Nancy	I0063-1 to I0063-4
Private Citizen	Maher, Michael; Maher, Robin	I0131-1, I0131-2
Private Citizen	Marshall, Peter	I0140-1
Private Citizen	Matthews, Beverly	I0029-1
Private Citizen	Matthews, Beverly; Matthews, Corwin	I0089-1, I0089-2
Private Citizen	McKelvey, Kate	I0106-1 to I0106-6
Private Citizen	McMahan, Charles	I0122-1, I0122-2, I0122-3
Private Citizen	McQueen, Mike	I0004-1, I0005-1, I0006-1 to I0006-10
Private Citizen	Millard, Doug	I0103-1
Private Citizen	Miller, Karen	I0094-1
Private Citizen	Monetti, Karl	I0008-1 to I0008-15
Private Citizen	Monetti, Susan	I0088-1, I0088-2, I0088-3
Private Citizen	Moorehead, Lisa	I0018-1, I0018-2, I0018-3, I0024-1, I0024-2
Private Citizen	Mortimer, Lee	I0009-1
Private Citizen	Mulford, Robert	I0072-1 to I0072-4
Private Citizen	Murry, John	I0187-1, I0187-2
Private Citizen	Musgrove, Jay W.	I0066-1
Private Citizen	Napier, Brian	I0175-1 to I0175-7
Private Citizen	Nienhueser, Helen; Nienhueser, Gayle	I0184-1 to I0184-5
Private Citizen	Nord, Marge	I0110-1 to I0110-9
Private Citizen	O'Connor, Patrick	I0163-1
Private Citizen	Obermiller, Matt	I0182-1 to I0182-5
Private Citizen	Odden, Mary	I0038-1 to I0038-22, I0057-1 to I0057-7
Private Citizen	Okonek, Brian	I0081-1 to I0081-7, I0119-1 to I0119-7
Private Citizen	Osborn, Phil	I0075-1, I0075-2
Private Citizen	Oskolkoff, Debra	I0142-1, I0142-2
Private Citizen	Oudal, Joanna	I0141-1, I0141-2, I0141-3
Private Citizen	Ownby, Janet	I0127-1 to I0127-6
Private Citizen	Page, Linda	I0101-1 to I0101-4
Private Citizen	Parker, David	I0013-1 to I0013-7
Private Citizen	Parrott, John	I0153-1, I0153-2, I0153-4
Private Citizen	Pearson, Charles	I0150-1, I0150-2, I0150-5
Private Citizen	Peterson, Marvin	I0162-1 to I0162-5
Private Citizen	Pickus, Norman	I0116-1, I0116-2
Private Citizen	Poirot, Steven	I0149-1, I0149-2, I0149-3
Private Citizen	Prescott, Robert	I0135-1 to I0135-4
Private Citizen	Probasco, Peter M.	I0025-1 to I0025-8, I0035-1
Private Citizen	Public, Jean	I0107-1

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Private Citizen	Quarberg, Don	I0065-1 to I0065-6, I0067-1, I0067-2, I0067-3
Private Citizen	Raffaeli, Jennifer	I0173-1, I0173-2
Private Citizen	Raffaeli, Michael	I0171-1, I0171-2, I0171-3
Private Citizen	Ransy, Denis	I0179-1 to I0179-8
Private Citizen	Reed, W.R.	I0132-1 to I0132-4
Private Citizen	Riddles, Michael	I0181-1, I0181-2, I0181-3
Private Citizen	Riedel, Felicia	I0092-1 to I0092-8
Private Citizen	Roberts, Shawn	I0003-1 to I0003-4
Private Citizen	Robinson, Noel	I0050-1, I0051-1
Private Citizen	Rodina, Jenny	I0061-1
Private Citizen	Ruff, Doyle	I0166-1, I0166-2, I0166-3
Private Citizen	Ruta, Scott	I0120-1 to I0120-4
Private Citizen	Rutledge, Charlie; Rutledge, Linda	I0086-1, I0086-2
Private Citizen	Salasky, Sheryl	I0109-1, I0109-2
Private Citizen	Sayre, Carolyn (Cari)	I0189-1 to I0189-7
Private Citizen	Schandelmeier, John	I0054-1, I0054-2
Private Citizen	Schapansky, Elwood	I0082-1, I0082-2
Private Citizen	Schwanke, Becky	I0170-1 to I0170-14
Private Citizen	Shier, Patrick	I0174-1
Private Citizen	Smart, John	I0002-1
Private Citizen	Smith III, Donald M.	I0056-1
Private Citizen	Smith, Randall	I0177-1
Private Citizen	Smith, Ron	I0180-1
Private Citizen	Stern, Peter	I0098-1 to I0098-17
Private Citizen	Stickwan, Gloria	I0058-1 to I0058-6
Private Citizen	Stocker, Jim	I0022-1 to I0022-4, I0031-1 to I0031-5
Private Citizen	Stokes, Peter	I0186-1 to I0186-4
Private Citizen	Strabel, Mark	I0161-1, I0161-2
Private Citizen	Strassenburgh, John	I0090-1 to I0090-10
Private Citizen	Sullivan, Dave	I0012-1
Private Citizen	Tappen, Paul William	I0134-1, I0134-2, I0134-3
Private Citizen	Teich, Cathy	I0044-1 to I0044-10, I0178-1 to I0178-6
Private Citizen	Terwilliger, Miranda; Stoeberl, Todd	I0172-1, I0172-2, I0172-3
Private Citizen	Theuer, William	I0159-1
Private Citizen	Turner, Gary	I0019-1
Private Citizen	Tyler, Randy	I0085-1 to I0085-7
Private Citizen	Valley, Earl	I0123-1 to I0123-4
Private Citizen	Wallin, Susan	I0121-1, I0121-2, I0121-3
Private Citizen	Wegner, Gary	I0168-1, I0168-3 to I0168-6
Private Citizen	Wesley, Robert	I0152-1 to I0152-4, I0152-6
Private Citizen	White, Chris	I0074-1 to I0074-5, I0077-1, I0077-2
Private Citizen	Wilken, Gary R.	I0128-1
Private Citizen	Wisdorf, Marcus	I0129-1, I0129-2
Private Citizen	Wojnowski, Matthew	I0111-1
Private Citizen	Wood, Mike	I0020-1 to I0020-5
Private Citizen	Wood, Ruth D.	I0185-1 to I0185-5
Resource Development Council (RDC)	Hall, Marleanna	N0045-1, N0045-2
State of Alaska	Parnell, Governor Sean	G0005-1

Table N-1. Directory of Comments (*continued*)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Talkeetna Air Taxi	Roderick, Paul	N0034-1 to N0034-5
Talkeetna Community Council, Inc.	The Talkeetna Community Council, Inc.	N0047-1 to N0047-30
U.S. Department of the Interior	Bergmann, Pamela	G0015-1 to G0015-35
U.S. Senator, State of Alaska	Murkowski, Lisa	G0021-1
Veterans for Peace	Mulford, Robert	N0015-1
Wellwood Center	Wellman, Dave	N0037-1 to N0037-4

N.2 PUBLIC AND AGENCY COMMENTS

- **G is Government comments in order by Identifier ID Number**
- **T is Tribal comments in order by Identifier ID Number**
- **N is Non-government comments in order by Identifier ID Number**
- **I is Individual comments in order by Identifier ID Number**

N.2.1 Government Comments in Order by Identifier ID Number

G0001

[REDACTED]

From: Emerson Krueger [REDACTED]
Sent: Friday, April 27, 2012 12:15 PM
To: ALCOM J08 Admin Box
Cc: Warren Keogh; John Moosey; Eileen Probasco
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: MSB_JPARC_EIS_comments_27Apr12.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good Day,

Please find attached letter with an initial comment on behalf of the Matanuska Susitna Borough on the draft JPARC EIS.

A paper copy was put in the mail today.

I was unable to submit the comment via the website.

v/r

Emerson Krueger
Planner
Matanuska-Susitna Borough
[REDACTED]

G0001



MATANUSKA-SUSITNA BOROUGH

Planning and Land Use Department
350 East Dahlia Avenue • Palmer, AK 99645
Phone (907) 745-9833 • Fax (907) 745-9876
Email: planning@matsugov.us

April 26, 2012

ALCOM Public Affairs
9480 Pease Ave, Suite 120
JBER, AK 99506

Re: JPARC DRAFT EIS Initial Comments

Dear Sir or Madam,

I have begun review of the draft EIS for the JPARC Modernization and Enhancement.

The comment and request for clarification was determined to require a response, ideally, before the borough proceeds with comments on the effects of the proposed alternatives.

Many of the tables in Chapter 3 that include various information on the extent and effects of the Alternatives appear to fail to list the extent and effects of Alternative E Fox 3 MOA as a standalone alternative.

Many Chapter 3 tables list three Fox 3 proposal areas:

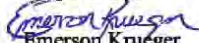
- 1 = Existing Fox 3 MOA
- 2 = Fox 3 MOA Alternative A and E
- 3 = Fox 3 MOA Alternative A

Review of Figure 2-1 and Figure 2-2 suggests that Fox 3 MOA Alternative A completely encompasses Fox 3 MOA Alternative E. These two figures lead one to believe that proposal area 2 is the same as proposal area 3.

Please clarify how the reader can discern the extent and effects of Alternative E in Chapter 3.

A reader could assume a typo in the footnotes and that the third proposal area is Alternative E. However, there are several tables that show the third proposal area to include items not included in proposal area 2. Therefore, it does not appear to be a simple typographic error

Respectfully,


Emerson Krueger
Planner

CF: Warren Keogh, District 1 Assembly Member
John Moosey, Manager
Eileen Probasco, Acting Director, Planning and Land Use

G0002

[REDACTED]

From: Karen Moneymaker [REDACTED]
Sent: Friday, April 27, 2012 12:12 PM
To: Hoog, Stephen L LtGen USAF PACAF 11 AF/CC; Post, James N III BrigGen USAF PACAF 354 FW/CC; Stepovich, Melissa M (GOV); Tom Moyer; Althea St. Martin; Chad Padgett; ALCOM J08 Admin Box
Subject: Request for JPARC EIS comment extension
Attachments: JPARK EIS LETTER.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Lt. Gen Hoog,

Please find attached the request to extend by 60 days the public comment period on the JARC draft EIS. The four mayors have strong concerns that the F-16 move has not been included in this document. Therefore our request is made to extend this comment period.

Thank you ,
Luke Hopkins
Mayor
Fairbanks North Star Borough

G0002



April 24, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

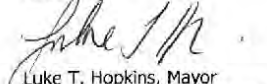
Dear Sir,

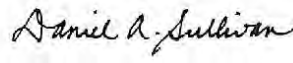
The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012.

The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.

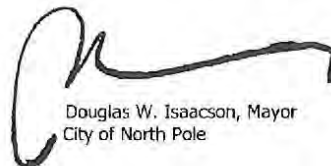
Thank you in advance.

Sincerely,


Luke T. Hopkins, Mayor
Fairbanks North Star Borough


Dan Sullivan, Mayor
City of Anchorage


Jerry Cleworth, Mayor
City of Fairbanks


Douglas W. Isaacson, Mayor
City of North Pole

Cc. Brigadier General James N. Post III
Alaska Governor Sean Parnell
US Congressman Don Young
US Senator Lisa Murkowski
US Senator Mark Begich

G0003

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): VERNO RUPRECHT Date: 5-23-12

Title: Mayor

Organization: CITY OF WASILLA

is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
 Air Quality
 Physical Resources
 Land Use
 Infrastructure and Transportation
 Water Resources
 Hazardous Materials
 Biological Resources
 Cultural Resources
 Socioeconomics
 Subsistence
 Environmental Justice

Proposed Actions:

- All proposed actions
 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
 2 - Realistic Live Ordnance Delivery
 3 - Battle Area Complex Restricted Area Addition
 4 - Expansion of R-2205 Restricted Area
 5 - Night Joint Training
 6 - Unmanned Aerial Vehicle Access
 7 - Enhanced Access to Ground Maneuver Space Areas
 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

G0003

Comment(s):

1. CARTRIDGE MOUNT + OTHER WILDLIFE IMPACTS?

2. TROOP MOVEMENT THROUGHOUT AREA IN FUTURE -
 WILL IT HAPPEN & THEN WHAT RESTRICTIONS
 ARE IN PLACE?

3. WHAT CHANGES TO THE CURRENT PLAN
 ARE PREDICTED WITHIN THE NEXT
 30 YEARS??

(IF YOU DON'T HAVE A PLAN FOR
 THE FUTURE IN LIGHT OF THE EVER
 CHANGING TRAINING NEEDS + EQUIPMENT -
 AND POTENTIAL OPER WHY NOT?
 TROOP SUPPOSING YOU DO - THEN DISCLOSE
 THE POSSIBLE SCENARIOS -

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

G0004

[REDACTED]

21 COLONEL ORR: All right. Our next speaker is Mr. Luke
22 Hopkins.

23 MR. HOPKINS: Yes, thank you. Luke Hopkins, Fairbanks
24 North Star Borough, the Mayor. So I will be submitting written
25 comments that would be much more extensive. I don't have those

[REDACTED]

G0004

■

1 formulated at this time. I do want to state though that I am
2 disappointed that this public hearing is on a Saturday, has been
3 scheduled here in Fairbanks, one of the major -- the second
4 largest community in Alaska, that it was scheduled for Saturday.
5 There are two sessions, I understand that, but Saturday night is
6 not a good time to have a public hearing. So I'm hoping that if
7 there are further public hearings held in this overall process
8 that they are scheduled in Fairbanks. We have the best turnout
9 and information dissemination on weekdays and I would ask that
10 that please be put into any further scheduling. I don't think
11 it's appropriate to have a -- as I said, a public hearing on
12 this issue on Saturday noon, especially in the summer. Thank
13 you.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

G0005

STATE CAPITOL
P.O. Box 110001
Juneau, AK 99811-0001
907-465-3500
fax: 907-465-3532



Governor Sean Parnell
STATE OF ALASKA

530 West Seventh Avenue, Suite 1700
Anchorage, AK 99501
907-269-7450
fax 907-269-7461
www.Gov.Alaska.Gov
Governor@Alaska.Gov

May 24, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
Joint Base Elmendorf-Richardson, AK 99506

To Whom It May Concern,

As Governor of the State of Alaska, I fully support the modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC). As the largest military training range in the United States, JPARC is critical to securing and defending our nation. In this heightened threat environment, it is vital that we make every effort to maximize the training opportunities for the brave men and women who serve in our Armed Forces.

I take seriously my constitutional duty as Governor to ensure the safety and security of Alaska's citizens and communities. Our Administration will continue to support the military industrial complex in Alaska while doing everything in our power to protect Alaska's pristine environment. For this reason, I believe the JPARC Environmental Impact Statement is an important and welcomed process.

I am confident that the State of Alaska and the United States Armed Forces will partner together in identifying a course of action that will allow for the expansion of military training capabilities, as well as the continued protection of our beautiful, natural environment.

Regards,

A handwritten signature in blue ink that reads "Sean Parnell".

Sean Parnell
Governor

G0006

[REDACTED]

22 REPRESENTATIVE FEIGE: Okay. I guess for the record, I'm
23 Representative Eric Feige. I represent House District 12 which
24 includes most of the JPARC area that we're talking about. One
25 of the things I'd like the folks to address is the issue of the

[REDACTED]

G0006

1 proposed floor for the Fox 3 MOA. Currently it's proposed to go
2 to 500 feet AGL and in talking to a number of the air taxi
3 operators, the pilots, for the record I'm -- I am a commercial
4 pilot with 17 years of bush flying experience here in Alaska.
5 I'm very familiar with the Talkeetna mountains and essentially
6 the rest of the Fox 3 MOA and do fly through it on a regular
7 basis in -- just in doing this job.

8 The area that really gets the most general aviation
9 traffic is the area sort of -- if you draw a line from about the
10 Susitna River across to the Alphabet Hills and south that area
11 seems to have the most -- the densest amount of general aviation
12 traffic, you know, mostly Supercubs and Cessnas and whatnot,
13 small float planes getting in and out of hunting cabins. It's
14 primarily during the non-winter months where you see a lot of
15 that traffic. It's during the, you know, primarily May to
16 October with a lot more activity occurring in the late August
17 through mid-October timeframe. It's kind of the highlight of
18 hunting season.

19 If that floor were to be raised to say 1,500 feet AGL or
20 at least a -- perhaps a new sector created within the MOA that
21 can be left off most of the time but only turned on when
22 absolutely necessary I think that would go a long way to
23 reducing some of the general aviation pilots' concerns about
24 basically getting run over by an F-16 or something larger. So
25 I'd ask that the folks putting this proposal together go ahead

[REDACTED]

G0006

■

1 and take a good long look at that.

2 I think alternative E where the southern boundary of the
3 Fox 3 MOA was -- instead of being south of Lake Louise it was
4 moved a little bit to the north so it only covered Tyone or Lake
5 Tyone or Lake Susitna I believe. Even if you move that southern
6 boundary in that sector to the outlet of Lake Susitna at the
7 very mouth of Tyone Creek that would be another good point to
8 put in there that would, again, relieve some of the concerns
9 that folks in the Lake Louise area have. And that's all I got
10 for now.

11 COLONEL ORR: Thank you.

12 THE REPORTER: Could you please spell your last name for
13 the record, sir?

14 REPRESENTATIVE FEIGE: It's spelled F-E-I-G-E and first
15 name is Eric with a C.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

E

G0007

[REDACTED]

17 COLONEL ORR: Thank you. Our next speaker is Ms. Mary
18 Leith is it?

19 MS. LEITH: Leith.

20 COLONEL ORR: Leith. All right. Thank you.

21 MS. LEITH: I'm Mary Leith, Mayor of the city of Delta
22 Junction. And the city of Delta Junction wants to state that we
23 made a memorandum of agreement with the Army in '06 and upon
24 investigation it was essentially omitted from the full JPARC
25 Draft EIS and as a result we feel the EIS is -- the Draft EIS is

[REDACTED]

G0007

1 defective.

2 There -- will there be an amended version of this before a
3 final version -- of the EIS before a final version comes out is
4 something that we're concerned about. Because we think, again,
5 it should be available for public comments after we see -- after
6 you've heard what people are concerned with. We will object
7 JPARC -- to JPARC moving the Final EIS without this opportunity
8 for review and comment. We note that JPARC was provided with a
9 copy of the '06 MOA by -- at the scoping meetings and still
10 failed to address it in the Draft EIS.

11 Numerous commitments contained in the '06 MOA are violated
12 by the proposed changes in the Donnelly training area and other
13 portions of training ranges near Delta and Gulkana. A partial
14 listing of the violations will be included in our written
15 comments which will be coming. The failure to discuss these
16 violations and the necessity for them makes the EIS incomplete
17 and inaccurate.

18 The proposed changes violate many of the concerns
19 underlying the '06 MOA, including, but not limited to, danger
20 from wildfire which is a big concern in this area, danger from
21 flooding, public safety arising from increased levels of
22 activities and increased noise in the area. The issues are more
23 critical given the higher intensity levels of training, the
24 broader types of training and greater expanded use of the
25 training area. These issues are not addressed or inadequately

[REDACTED]

G0007

1 addressed in the Draft EIS.

2 When the city acquiesced to the inadequate use or ac --
3 Donnelly range expansion EIS in '06 it did so with the
4 commitment by USARAK that training at the Caktif (ph) and Backs
5 (ph) would be limited to those described in the supplemental EIS
6 prepared by USARAK. The city pressed for those facilities to be
7 located at the south end of the Donnelly training area. USARAK
8 pressed for a location at the north end of the Donnelly training
9 area immediately joining city limits. We did much of this based
10 upon our own experience with fire only a little bit prior to
11 that. The compromise described in the 2006 MOA is that the city
12 would acquiesce to the closer, more dangerous location, but only
13 with safeguards and with the Army's assurance that the training
14 activities would be limited to those described in the
15 supplemental Draft EIS. The JPARC Draft EIS fails to address
16 that bargain or JPARC's reasons for violating the bargain.
17 Which we searched it, there -- it was never mentioned once.

18 These comments to the public hearing are not a complete
19 list of our concerns. Complete written comments will be
20 submitted to you by June 7th, 2012, but unless these issues are
21 fully addressed in a supplemental Draft EIS it's more likely
22 than not that the city will challenge the adequacy of the JPARC
23 Draft EIS leaving aside any claim by the city for breach of the
24 '06 MOA. And if we have any -- like I say, we really do expect
25 to see again the Draft EIS so that -- you know, amended one so

[REDACTED]

G0008



April 24, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

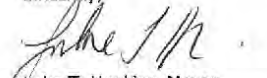
Dear Sir,

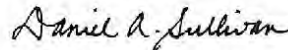
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The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.

Thank you in advance.

Sincerely,


Luke T. Hopkins, Mayor
Fairbanks North Star Borough


Dan Sullivan, Mayor
City of Anchorage


Jerry Cleworth, Mayor
City of Fairbanks


Douglas W. Isaacson, Mayor
City of North Pole

Cc. Brigadier General James N. Post III
Alaska Governor Sean Parnell
US Congressman Don Young
US Senator Lisa Murkowski
US Senator Mark Begich

G0009

The TRUST
LAND OFFICE

June 4, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Re: JPARC Draft EIS comments

These comments are submitted on behalf of the Alaska Mental Health Trust Authority by the Trust Land Office (TLO). The TLO's scoping comments dated January 28, 2011, appear to have had no influence on development of the draft EIS. Because of this I am incorporating the TLO's previous objections by reference in this review to the draft EIS.

Our earlier objection to remotely piloted aircraft (RPA)/unmanned aerial vehicle (UAV) corridors identified over Trust land needs to be corrected and expanded. The lack of spatial references in the scoping documents resulted in an underestimation of the amount of Trust land that will be impacted by unmanned aerial vehicle overflights. The following table shows specifically the number of Trust parcels involved and the total acreage for each of the proposed corridors.

Area	Parcels	Acres
Eielson R-2205	12	1,034
Eielson R-2211	31	1,898
Ft. Wainwright R-2205	20	3,363
Ft. Wainwright R-2211	87	3,532
Total acres		9,827


Establishment of these corridors with RPA/UAV overflights can be expected to diminish value of these Trust lands for residential and/or recreational development; although difficult to quantify, any reduction in land values from these plans is unacceptable.

The TLO continues to object to inclusion of live fire on the west and northwest boundaries of the Yukon Training Area.

The TLO continues to object to expansion of any use of the Yukon 1 MOA that could interfere with mineral development of the Trust Salcha Block of land.

My staff contact for this review is Cindi Bettin, Senior Lands Manager, who can be contacted at (907) 269-8751 or <cindi.bettin@alaska.gov>.

Sincerely,



Greg Jones
Executive Director

Alaska Mental Health Trust Land Office

2200 Eielson Avenue, Suite 120, Anchorage, AK 99506-1500, (907) 269-8751, (907) 269-8752, (907) 269-8753, www.alaskamentalhealthtrust.org

G0010

Submittal ID	Commenter	Title	Organization	Topic List	Comment
G0010	gary mullen			Description of Proposed Actions and Alternatives (DOPAA), Mitigations, Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	As stated in the previous comment period the airspace starting at 500 AGL throughout the MOA along with no restrictions on the scheduling of active use is unacceptable. This type of unrestricted activity is a serious hazard to wildland fire fighting and fire detection is flown in this area throughout the summer months. Simply raising the ceiling would create a safety buffer for all civilian aircraft and would allow Part 135 aircraft to operate legally within the airspace.

G0011

Submittal ID	Commenter	Title	Organization	Topic List	Comment
G0011	Charles McMahan	Chairman	Copper Basin Fish and Game Advisory Committee	General (to the EIS), Airspace Management, Safety (Airspace), All proposed actions, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	On behalf of the Copper Basin Fish And Game Advisory Committee I am formally opposing the expansion of the Fox 3 MOA and more specifically the lowering of the floor of these areas from 5,000 feet to 500 feet for military operations with high speed aircraft. There are many reasons but the main reason we oppose this is for safety purposes for the countless flights that are flown for game counts, surveys, predator control, radio collar tracking of game, and for the thousands of hours of recreational flights for hunting, fishing and other outdoor activities. By mixing high speed jets with slow and hard to see private aircraft in the same airspace, we feel safety would be severely compromised and it would be unacceptable. There are thousands of hours flown each year by hundreds of folks in these areas, and a mid-air collision would be inevitable at some point in time if these changes are made. Sincerely, Charles McMahan Chairman, Copper Basin F&G Advisory Committee

G0012

From:

06/20/2012 13:46

#068 P.001/002

P.O. Box 480 Healy, Alaska 99743
Phone: 907 683-1330
Fax: 907 683-1340
Email: dbgovt@mtsonline.net

DENALI BOROUGH

Fax

To: ALCOM Public Affairs	From: Gail Pieknik, Borough Clerk
Fax: (907) 552-5411	Pages: 2
Phone:	Date: 6/20/2012
Re: JPARC	CC:

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

• **Comments:**

The Denali Borough Assembly met at a regular meeting on Wednesday, June 13, 2012. At this meeting, the Borough Assembly voted unanimously to have the Borough Clerk resubmit Denali Borough Resolution 11-05 as the Borough's comment on the JPARC draft EIS. Please see the attached Denali Borough Assembly Resolution 11-05.

G0012

From:

06/20/2012 13:47

#068 P.002/002

DENALI BOROUGH, ALASKA
RESOLUTION NO. 11-05

A RESOLUTION BY THE DENALI BOROUGH ASSEMBLY SUPPORTING THE NO ACTION ALTERNATIVE CONCERNING THE JOINT PACIFIC ALASKA RANGE COMPLEX (JPARC).

WHEREAS, the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement proposes extending training, including live ordnance delivery, within the confines of the Denali Borough; and

WHEREAS, the Denali Borough Assembly is the governing body of the Denali Borough; and

WHEREAS, the areas in question are important to Denali Borough residents for a variety of uses including hunting, recreation, and access to private property; and

WHEREAS restrictive and constraining uses of Denali Borough lands have been identified by the extension of the in-place bombing and military lands identified in the JPARC Environmental Impact Study.

NOW THEREFORE BE IT RESOLVED: that the Denali Borough Assembly supports the "No Action" alternative concerning proposed realistic live ordnance delivery.

PASSED and APPROVED by the DENALI BOROUGH ASSEMBLY this 9th day of FEBRUARY, 2011.


MAYOR DAVID M TALERICO

ATTEST: 
GAIL PIEKNIK, BOROUGH CLERK



Ayes: PASSED UNANIMOUSLY
Absent: HOLMES, LAUSEN, BULARD and EVANS

G0013

Submittal ID	Commenter	Title	Organization	Topic List	Comment
G0013	Paul Hunter	External Review Coordinator	National Park Service, Alaska Regional Office	All resource areas, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW National Park Service Alaska Regional Office 240 W. 5th Avenue Anchorage, AK 99501 ALCOM Public Affairs 9480 Pease Avenue, Suite 120 JBER, AK 99506 The following comments are provided for the draft environmental impact statement (DEIS) for proposed U.S. Department of Defense military training for the Joint Pacific Alaska Range Complex (JPARC) in Alaska: While the JPARC does not include park areas directly, it is near the Wrangell-St. Elias National Park and Preserve (WRST). Impacts on subsistence in one area necessarily influence subsistence in nearby areas. For this reason, there is concern regarding the effects of training operations on subsistence users within Alaska Game Management Unit 13, especially along the Denali and Richardson Highways. The subsistence analysis for the expanded Fox 3 and new Paxon MOAs is incomplete in terms of the communities analyzed, the data upon which the analysis is based, and how the communities are classified with regard to their dependence on subsistence. Limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances. Instead of the handful of communities included in the draft EIS, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) under the Federal Subsistence Program for moose, caribou or both on lands within the Fox and Paxon MOAs. Customary and traditional use determinations are based on an analysis of all available data regarding patterns of resource use and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule. In what follows, the phrase "potentially affected rural communities" refers to the communities that have C&T for moose or caribou in the MOAs.</p> <p>Also, community harvest data that is over twenty years old is not adequate to evaluate impacts to contemporary subsistence livelihoods (To those familiar with this data, the "most representative year" referred to in the analysis is identifiable as the most recent year for which comprehensive subsistence survey data are available). JPARC could follow the lead of the Alaska Gas Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support updated surveys where needed. The Susitna-Watana Hydroelectric Project is similarly considering the need to conduct updated comprehensive subsistence surveys as part of its planning process.</p>

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G0013	<p>As a first step, the list of potentially affected rural communities (as discussed above) could be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding could be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information for the potentially affected rural communities can be incorporated into the subsistence impact analysis. Finally, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations fails to recognize the importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the "high dependence" category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities in which 80 percent or more of the households report using subsistence resources should be classified as high dependence regardless of the community's composition. Thank you for the opportunity to comment, and for extending the comment period. If you have questions, you may contact Barbara A. Cellarius, Ph.D., Cultural Anthropologist/Subsistence Specialist, Wrangell-St. Elias National Park and Preserve, P.O. Box 439, Copper Center, AK 99573-0439, Tel: 907 822 7236, Fax: 907 822 7216, Email: barbara_cellarius@nps.gov, for further information. Sincerely /s/ Paul Hunter for Joan Darnell, Team Manager Environmental Planning and Compliance</p>
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[REDACTED]

From: Phelps, Bruce G (DNR) [REDACTED]
Sent: Thursday, July 05, 2012 3:20 PM
To: ALCOM J08 Admin Box
Cc: Goodrum, Brent W (DNR); Parsons, Martin W (DNR)
Subject: DNR Comments on JPARC Proposal
Attachments: ADNR response to JPARC 5 July 2012.pdf

See attached. If any clarification is needed contact me at [REDACTED]

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STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF MINING, LAND AND WATER

SEAN PARNELL, GOVERNOR

550 WEST 7TH AVENUE, SUITE 1070
ANCHORAGE, ALASKA 99501-3579
PHONE: (907) 269-8600
FAX: (907) 269-8904

July 5, 2012

ALCOM Public Affairs
9480 Pease Av. Suite 120
JBER, AK 99506-2101

Subject: Review of Realistic Live Ordinance Delivery, EIS for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska

Dear Sir:

The following are the Alaska Department of Natural Resources' (DNR) comments and recommendations on the Definitive Action described in the EIS related to the Realistic Live Ordinance Delivery proposal. The first part of this response identifies issues related to clarity of the proposal and provides additional background information pertinent to the closure of state land. The second identifies proposed changes to the Realistic Live Ordinance Delivery option, and a final section focuses on those actions that may be required by the state to ensure public safety when live fire exercises are underway. These comments assume that either the Donnelly Training Area or the Blair Lakes Training Area are available and that the actual delivery of ordinance occurs within a limited area within each of these training areas.¹ It is also assumed that the military can or should be able to identify specific portions of the overall target area that may be affected at specific periods of the year.

Clarity of Proposal. Table 2-5 identifies Airspace Designation and the annual days of use. In the case of R-2202A, B, C, and D the number of days of use is approximately 250. In the case of R-2211 it is 170. However, on page 2-12, line 27, use days are identified as 150 annually. The text needs to be clarified to explain why R-2211 cannot be used more frequently, and there needs to be discussion, if Alternative B is selected, on the distribution of use days between the two Training Areas. It would seem that a more even distribution would result if alternative training sites were available. There also needs to be some discussion as to whether there is the ability by the military to shift the sortie approach from one attack angle/area to another in order to avoid the public recreation and hunting. This is important since the public uses particular areas at specific times of the year, and the avoidance of these areas through the selection of specific attack vectors would mitigate impacts.

Background Information. The following information was compiled through discussions with the ADF&G area biologist, staff within the Northern and South-central Regional Offices of the Division of Mining, Land, and Water (DMLW), Northern Regional Office of the Division of Parks and Outdoor Recreation, and the DMLW Mining Section.

¹ Based on discussions with JPARC personnel, the delivery of ordinance occupies a specific horizontal and vertical portion of the Drop Areas. For example, a delivery could use the area of R-2202A, as depicted in Figure 2-4. It would seem, then, that this horizontal and vertical airspace could be managed in such a way that during periods of the year when a sensitive public activity occurred near the impact zone, that the vector furthest away from this site could be selected for use at that time.

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Moose Hunting. The principal use in the ground evacuation areas is for moose hunting, conducted during two general time periods during the year – fall and winter. The fall period extends from August 15 to September 15 with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time periods early winter (November 15 to December 15) and late winter (January 15 to February 28). Winter hunts generally occur on weekend days when weather conditions permits. The time period between December 15 and January 15 is generally avoided due to seasonal low temperatures. During the fall hunting period, access for hunting is generally provided by ATV trails, rivers, and airstrips. During the winter hunting period, access is generally more widespread as more areas are accessible via snowmobile. Of the areas affected by the “Definitive Actions”, the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.

Recreation and Other Uses. Recreation use is scant, especially in relation to other areas that are closer to the road system, with some amount of concentration occurring at Rainbow Lake and the Richardson/Clear areas. Other areas experience some use, with most of that occurring on weekends along the Rex Trail and the Wood River. Access from the east is provided by DNR Division of Forestry roads, from the north by Wood River and the airstrip near Gold King, and from the west by the Rex Trail. Much of this use is related to access to home sites in the Wood River drainage, where a state subdivision exists, and mostly occurs on the weekends, but also including Friday afternoon activity. Mining operations are limited to some exploration activity in the area of the mining claims west of the Donnelly Training Area, and it is not expected that mining activity will concentrate in the ground evacuation areas owing to the absence of mineralized deposits. Finally, depending on the source consulted, there are between six and 12 trap-lines that are run in this area. These target wolf, lynx, and martin.

In general, then, the principal use of the ground evacuation area is related to moose hunting, but this hunting occurs during two periods, as noted above. The EIS identifies only the September period for moose hunting and it uses different dates than those actually associated with this hunting activity. Mitigation measures should therefore focus on this period of time. Moreover, this pattern is also likely to continue in the future; there are no additional state land disposals that are planned and the area lacks access and economically usable resources.

Changes to Mitigation Measures. While the state is very much interested in providing a training area for the military that permits the continuation of the current forces in the Fairbanks area, this must be weighted against the impact that the Realistic Live Ordinance Delivery option upon the public and, specifically, their use of state land. Our interest is in minimizing that impact. The following changes to the current mitigation measures are recommended. We also believe that the use of both the Blair Lake and Donnelly impact areas is appropriate since this alternative (B) minimizes adverse effects to public activity on state land during high use periods, which tend to occur during the fall hunting season.

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- The number of actual days that the ground evacuation area is closed under the Definitive Actions needs to be clarified. The text on pg 2-12 line 27 states activities would be conducted 150 days annually, while the table 2-5 presented just prior indicates 250 days of annual use.
- Information provided by ALCOM planners indicates that no training activities will occur during Saturday and Sunday throughout the year. Additionally, pg 6 line 29 indicates that no training activities will occur after 7:00 pm on Friday including Saturday and Sunday. In recognition of use patterns by hunters, the year round restriction on training activities on weekends should be extended to include Friday afternoon. People using the ground evacuation area often gear up, travel to the area, and start using these areas beginning in the early afternoon of Friday. It is therefore appropriate to accommodate this activity since it is directly related to the weekend use of this area. Openings on Fridays should be restricted to 0700 to 1400 hours.
- The period when no training exercises will occur related to moose hunting season should be changed, to reflect the actual current pattern of use. Closure should occur from August 15 to September 15, November 15 to December 15, and January 15 to February 28. These dates may change over time and it is recommended that the military review the closure dates with the ADF&G at the beginning of the year (or another time that may be appropriate for the parties. The closure of the ground evacuation area between June 27 and July 11 is considered appropriate.
- Include alternatives and/or recommendations for the horizontal/vertical stratification of the attack vectors, to provide for diversity of approach and to minimize impacts on the public. See comments that immediately follow.
- During the moose hunting periods, sorties should be directed to the Blair Training Area for inert ordnance and to the use of attack vectors that are more distant from Wood River. During the same period, inert and live ordnance may use the Donnelly Training Area. Our preference is that the more northerly/easterly attack vectors be used during this period within this area.
- At other times of the year, operations are appropriate in either training area, although our preference is to use attack vectors that are to the north and east and that avoid the Wood River and Rex Trail areas in the Blair Lakes Impact Area and to use attack vectors with a similar orientation for the Oklahoma Impact Area, to avoid use areas to the west.
- In addition to these measures it is recommended that the military publish, at the beginning of the calendar year, proposed closure areas and the dates associated with this use. This will allow the public to know in advance which areas are to be avoided, especially if it is ultimately determined that both military training areas are to be used and that specific attack vectors are to be used. This information should be displayed on maps that are easy for the public to understand.
- The military should coordinate with local government and the Alaska Department of Natural Resources on an annual basis, or as needed, to provide information and maps that identify closures and public access restrictions.

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State to Prepare Regulations. As we have indicated in both discussions with military staff and in correspondence, since the military must have control over the surface at the times of ordinance delivery, the state will be obliged to develop a special use designation (SUD) for the impacted areas as well as implementing regulations. Without the use of these methods the federal government will not be able to ensure control over this area and therefore meet federal requirements for the control of surface activities in areas that it does not own.

From our perspective, the SUD and its regulations must be developed in such a way that maximum public use of the ground evacuation areas is retained while closing such areas for the minimum period of time necessary to conduct such operations. The SUD will have to identify areas and dates of closure and will have to indicate which activities are affected. (We presume that all public access to and uses within the ground evacuation areas may not be precluded.) To ensure that we meet the test of minimizing impacts to the public, the mitigation measures that are identified above must be given careful consideration and incorporated where feasible. We also recommend Alternative B as described on p. 2-16 as the preferable option. The regulations must reflect the access recommendations contained in the SUD.

Although this letter deals with the Realistic Live Ordinance Delivery proposal, I need to emphasize that DNR has also serious concerns with the proposed Military Operating Area (for aircraft) and specifically with the probable impacts of that proposal on public access, including both land access and aircraft movement. These concerns and the state's response to these issues are to be provided, however, by the Alaska Department of Transportation and Public Facilities in separate correspondence.

Should you wish to discuss this further or require clarification of issues that are identified here, please contact Bruce Phelps, Chief, Resource Assessment and Development Section at 269-8592 or bruce.phelps@alaska.gov


Brent Goodrum, Director
Division of Mining, Land, and Water

G0015

[REDACTED]

From: Mutter, Doug [REDACTED]
Sent: Thursday, June 28, 2012 4:37 PM
To: ALCOM J08 Admin Box
Cc: Bergmann, Pamela
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: ER12_235_JPARC_DEIS_DOI_comments.pdf

Attached are the U.S. Department of the Interior comments on the Draft JPARC Modernization and Enhancement Environmental Impact Statement.

Douglas Mutter
Regional Environmental Assistant
U.S. Department of the Interior
Office of Environmental Policy and Compliance

[REDACTED]





United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501-5126

9043.1
PEP/ANC
ER 12/235

June 28, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506-0898

Dear Lieutenant General Hoog:

The Department of the Interior has reviewed the March 2012 Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS). The Draft EIS analyzes twelve military training improvement actions proposed on military range lands, maritime training areas, and airspace units of the U.S. Department of Defense (DoD) in Alaska.

Our comments and recommendations are made in accordance with the National Environmental Policy Act, Endangered Species Act, Fish and Wildlife Coordination Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Wild and Scenic Rivers Act, and Federal Land Policy and Management Act. Our general comments are below; specific comments are provided in Attachment 1. We believe these comments need to be addressed in the Final EIS.

Threatened and Endangered Species

The short-tailed albatross (*Phoebastria albatrus*) is listed as endangered under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq; 87 stat 884, as amended). Short-tailed albatross is a pelagic seabird whose range includes the Gulf of Alaska in the Temporary Maritime Activities Area during the months of April through October. In February 2010, the U. S. Navy (Navy) produced a *Biological Evaluation (BE) for the Gulf of Alaska Navy Training Activities* (referenced in Navy 2011). The BE assessed potential effects of Navy training activities on short-tailed albatross and described effective protective measures for the species. Information on potential effects of the proposed training activities and mitigation measures that will be used to avoid adverse impacts to short-tailed albatross in the Gulf of Alaska need to also be included in the Final EIS.

The proposed programmatic action for “Missile Live Fire for AIM-9 and AIM-120” occurs in the summer range of the short-tailed albatross in the Gulf of Alaska. Therefore, the Final EIS needs to state that DoD will initiate consultation with the Fish and Wildlife Service (FWS) for short-

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tailed albatross, if the “Missile Live Fire for AIM-9 and AIM-120” action is developed into a “Definitive Action.”

Migratory Birds and Bald and Golden Eagles

As discussed below, existing data and additional information for eagles need to be presented and analyzed in the Final EIS. For example, the number of bald and golden eagles that inhabit the proposed Fox 3 and Paxson Military Operations Areas (MOAs) needs to be included and analyzed in the Final EIS. FWS maintains a geospatial database with historic eagle nest locations (see Attachment 2). These data, which represent nests easily observed from roads and highways, are available for public and agency use. It should be noted that, although not a complete depiction of all eagles in the area, the map indicates records of approximately 1,074 bald and golden eagle nest sightings within the JPARC Region of Influence as described in the Draft EIS. The Final EIS also needs to more clearly identify the number of bald and golden eagles potentially at risk during nesting periods due to DoD activities along the definitive low-level flight paths.

The Final EIS also needs to analyze mitigation measures to help ensure all nesting and/or molting migratory birds are not adversely impacted by low-level flights. Scientific literature indicates human-caused disturbance can change behavior and spatial distribution of waterfowl (Manci et al. 1988, Dahlsgren and Korschgen 1992). Effects include interruption of feeding (Madsen 1985, Ward et al. 1994), displacement from feeding areas (Kramer et al. 1979, Belanger and Bedard 1989, Conomy et al. 1998), and increased energy expenditure resulting from escaping behaviors (Korschgen et al. 1985, Jensen 1990). If disturbances are sufficiently frequent, disturbance may result in reduction of energy reserves (White-Robinson 1982, Belanger and Bedard 1990, Miller et al. 1994) important for migration (Owen and Black 1989), molt (Taylor 1993, 1995), and survival (Haramis et al. 1986). The Draft EIS acknowledges significant bird migration routes in Interior Alaska and identifies high-density areas of nesting waterfowl that underlie the Expanded Fox 3 and Paxson MOAs; page 3-47 notes “Habitat used by ducks, geese and trumpeter swans is especially important under the southwestern part of the Fox 3 expansion area and the southern part of the proposed Paxson MOA, coinciding with the larger river systems and marshy areas.” The combined Fox 3 and Paxson MOAs cover more than 2 million acres of nationally-significant waterfowl nesting habitat. Most migratory bird nesting (and the associated post-nesting molt of adult birds) occurs in Interior Alaska between April 15 and August 1. Prohibiting low-level flights (i.e., flights below 1,600 feet) between April 15 and August 1 (USFWS(2) 2007) could help reduce or eliminate the potential impact to nesting and molting migratory birds.

Moreover, the Final EIS needs to provide and analyze information on the potential effects of aircraft overflights on nesting birds. While some studies have been conducted in Alaska on potential effects of aircraft on migratory birds; as noted below, the effects appear to differ widely among species of birds, and their potential habituation to aircraft disturbance. For example, Palmer et al. (2003) studied the effect of jet aircraft overflights on the parental care of peregrine falcons (*Falco peregrinus*) breeding along the Tanana River in Alaska during 1995-1997. Military jets flying at or below 150 meters (about 500 feet) in the vicinity of specific nest cliffs within established Military Training Routes caused only subtle differences in peregrine parental behavior, no significant differences in nest attendance patterns, and no reduction in productivity

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of nesting pairs (Nordmeyer 1999). Ward et al. (1999) observed the behavioral response of fall-staging flocks of Pacific Brant (*Branta bernicla nigricans*) and Canada geese (*B. canadensis taverneri*) to a variety of aircraft and found 75 percent of brant flocks and 9 percent of Canada goose flocks flew in response to overflights, with an inverse relation between altitude and response and with the greatest response occurring at aircraft altitudes between 305 and 760 meters (1,000 to 2,500 feet). In that study, lateral distance was a more consistent predictor of response than altitude, with the greatest disturbance occurring when aircraft were within a lateral distance of ≤ 1.6 kilometer (about 1 mile) to the flock. Please refer to Attachment 3 for citations of studies we believe will help facilitate analysis of the potential impacts of aircraft overflights on nesting birds. The resulting analysis needs to be included in the Final EIS.

We are concerned the newly proposed low-altitude MOA, extending from 500 to 5,000 feet above ground level (AGL) in both the Fox 3 and Paxson MOAs, could result in significant adverse impacts to nesting migratory birds. The “Definitive Actions” in the Draft EIS are vague and do not provide specific actions to protect a given resource. For example, the Proposed Mitigation for the Fox 3 and Paxson MOAs (Table K-2 on page K-9), states: “Consult with the USFWS with regard to compliance with Bald and Golden Eagle Act and MBTA. As required, conduct bald and golden eagle surveys in proposed Fox 3 and Paxson MOAs over previously unsurveyed areas. Coordinate the results with USFWS.” The Final EIS needs to clarify and specify proposed mitigation measures for “Biological Resources,” including nesting migratory birds. The most commonly-recommended best management practice for protecting nesting swans, other waterbirds, and raptors (as well as other wildlife) in the vicinity of aircraft overflight is to maintain aircraft operating guidelines limiting helicopter and fixed-wing overflights to a minimum of 400-500 meters (approximately 1,300-1,600 feet AGL) with no circling over nests or aggregations (Komenda-Zehnder et al. 2003, and Churchill and Holland 2003). The National Bald Eagle Management Guidelines (USFWS 2007) recommend helicopters and fixed-winged aircraft avoid eagle nests by 1,000 feet during the breeding season, except where eagles have demonstrated tolerance for that activity. DoD needs to consult with the FWS prior to completing the Final EIS to determine what specific protective mitigation will need to be included in the Final EIS to protect nesting migratory birds.

Recreation Resources and Activities

We recommend that the footprint of the Fox 3 MOA, as described in Alternative E, be moved to the north by approximately 20 nautical miles to help reduce the negative effects on opportunities for solitude in the Lake Louise area.

We are concerned that the flight ceiling for both the FOX 3 and Paxson MOAs in both Alternatives A and E has been lowered from 5,000 feet AGL to 500 feet AGL. It should be noted that the Bureau of Land Management (BLM), through its recreation program, has documented over the years, numerous encounters by recreational users of BLM-managed lands with military overflights. These encounters have included low level overflights in the current Fox 3 MOA on the Upper Tangle Lakes and Delta River; some of these encounters included shockwaves and loud noise associated with aircraft breaking the sound barrier. We believe a lower flight ceiling in the Fox 3 MOA, combined with the same lower flight ceiling in the proposed new Paxson MOA, would likely reduce opportunities for solitude on many of the lands BLM manages. With recreational visitation to developed facilities and backcountry trails on

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BLM-managed lands in this area and on the Gulkana and Delta Wild and Scenic Rivers annually exceeding 150,000 visitors, the Final EIS needs to include avoidance areas and mitigation measures that will preserve opportunities for solitude on the nationally-designated Gulkana and Delta Wild and Scenic Rivers and associated developed facilities for the Fox 3 and Paxson MOAs in both Alternatives A and E.

We recommend that the Final EIS identify a mechanism (e.g., telephone number or web site) for providing the public and land managers at least annually, or more often as appropriate, information on flights and maneuvers. This mechanism should be structured so that it offers the opportunity for recreational users to provide feedback to DoD, such as reports of non-compliance and/or complaints. This could also be used by both DoD and BLM for tracking issues and documenting successful mitigation.

Wildland Fire Management

Under the proposed action #6, newly created “corridors” between Eielson Air Force Base (AFB) to R-2211; Eielson AFB to R-2205; Allen Airfield to R-2202; R-2202 to R-2211; R-2205 to R-2202; Fort Wainwright to R-2211; and Fort Wainwright to R-2205 would, in essence, create a virtual “wall” extending nearly 90 air miles from Fairbanks and Fort Greely. This virtual “wall” would go from 1,200 AGL to 17,999 AGL. DoD has indicated that these corridors would be in operation from 07:00-19:00 Monday through Friday, or as extended by a Notice to Airmen. It is our understanding that the purpose of these corridors is to allow operation of Unmanned Aircraft Systems (UAS). According to the Draft EIS, if the Army meets all Federal Aviation Administration requirements for UAS use in the National Air Space, the Certificate of Authorization process, as it currently stands, would shut down the airspace in these proposed corridors. However, even if military Unmanned Aerial Vehicle aircraft were outfitted with Mode-C transponders, most of the BLM Alaska Fire Service (AFS) air fleet and contracted aircraft do not have Traffic Collision Avoidance avionics.

A virtual “wall” of this magnitude, as described in the Draft EIS, would likely result in significant negative effects on the BLM AFS and Alaska Department of Natural Resources Division of Forestry (DOF) joint aviation operations for fire management by cutting off access to the east for AFS and DOF, and cutting off access for DOF to the west. Three of the five wildland fire air tanker bases located in Alaska are on either side of this virtual “wall” in addition to all of the helitack and smokejumper bases. Furthermore, 1,200 to 17,999 AGL cuts off all Visual Flight Rules (VFR) traffic heading in either direction. As a result, only pressurized aircraft (the majority of which are not part of the BLM air fleet or their contracted fire management aircraft) could make the east-west transition, since only pressurized aircraft are capable of flying at altitudes of 18,000 and above.

We believe DoD needs to include in the Final EIS, an alternative approach to UAS use of air space and corridors that does not negatively impact AFS/DOF aviation operations for fire management, which are essential to helping protect life and property during wildland fires. In order to eliminate this virtual “wall,” we recommend DoD continue the practice of moving UAS between MOAs and other special use air space via ground transportation.

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We appreciate the opportunity to comment on this document. For technical assistance or questions regarding threatened/endangered species or migratory birds (including bald and golden eagles), please contact Jewel Bennett at the Fairbanks FWS Field Office at 907-456-0324. For technical assistance or questions regarding BLM-managed lands, wildfire activities, or Wild and Scenic Rivers, please contact Serena Sweet at the Anchorage BLM State Office at 907-271-4543.

Sincerely,



Pamela Bergmann
Regional Environmental Officer - Alaska

Attachments

G0015**Attachment 1****Specific Comments**

Page 1-36, Line 42, Section 1.6.4.3.1 Federal Agencies with Jurisdiction by Law, United States Fish and Wildlife Service: The jurisdictional responsibility of the FWS for administration of the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act needs to be added to this section.

Pages 2-6 and 2-7, Section 2.1.1.1. Alternative A: The Draft EIS states that the flight ceiling for routine training exercises in Alternative E for the Paxson MOA would be limited to 13,000 feet Mean Sea Level (MSL) and above (see page 2-7), while the flight ceiling for routine training exercises in Alternative A is 14,000 feet MSL and above (see page 2-6). The Final EIS needs to clarify why the flight ceiling is lower in Alternative E than Alternative A, given that Alternative E was designed to “provide a greater separation from the airways, jet routes, and airfields located south of the proposed airspace boundaries” (page 2-7). We believe the flight ceiling for routine training exercises in the Paxson MOA for Alternative E needs to at least match the flight ceiling for routine training exercises for the Paxson MOA in Alternative A at 14,000 feet MSL and above, and that this information needs to be included in the Final EIS.

Page 3-13, Line 13, Section 3.1.1.3.1 Alternative A: To ensure accuracy, the reference to “fire” needs to be changed here, and throughout the Final EIS, to “wildland fire.”

Page 3-30, Lines 23-26, Section 3.1.3.3.1 Alternative A, Bird/Wildlife-Aircraft Strike Hazards: The Draft EIS does not specify the “consideration of additional means for monitoring...heightened risks of bird strikes” in the Fox 3 and Paxson MOAs zones. The Final EIS needs to specify “limits that would be placed on low-altitude flight activities.” The BLM-managed lands within these proposed MOA expansions provide habitat for populations of sensitive species (e.g., trumpeter swan and golden eagle) that may be adversely affected due to bird strikes caused by military aircraft between the 500 to 2,500 foot AGL. The Final EIS also needs to include information on what scientific means would be used to track migrations of birds, since “anecdotally observing lots of birds” is insufficient. As identified in Bruderer (1997) and Gauthreaux and Belser (2003), use of radar equipment can help in determining when large flights of birds are traveling north before and/or during Major Flying Exercise (MFEs) and regular training events. In addition, monitoring weather systems, especially wind speed and direction, can also help determine when to expect higher frequencies of migrations (Gauthreaux and Belser 2003).

Page 3-31, Line 4, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “wildlife fires” needs to be corrected in the Final EIS to read “wildland fire” and “wildfire management” needs to be corrected to read “wildland fire management.”

Page 3-31, Line 6, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “fire management” needs to be corrected in the Final EIS to read “wildland fire management.”

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Page 3-49, Lines 25-29, Section 3.1.8.3.1 Alternative A: The Final EIS needs to ensure that the proposed Fox 3 and Paxson MOAs include the 3,000-foot AGL overflight buffer over the Nelchina Caribou Herd Calving Grounds (represented in Figure 3.5 on page 3-41) annually from May 15 to June 15. This also corresponds with Wolfe et al. 2000, who recommends minimizing disturbance during critical stages (i.e., calving season) when cows were the most susceptible to elevated energy requirements.

Page 3-50, Lines 2-3, Section 3.1.8.3.1 Alternative A: We recommend maintaining in the Final EIS, a limitation of supersonic operations at altitudes of 5,000 feet AGL, or 12,000 feet MSL to help minimize noise disturbance to wildlife inhabiting the area when operations take place.

Page 3-50, Line 35, Section 3.1.8.4 Mitigations: In addition to all mitigation measures listed, the Final EIS needs to include an extension of “established noise sensitive areas” (see Figure D-3 on page D-13) that encompasses the west fork of the Gulkana National Wild and Scenic River. This extension is necessary due to the high number of active Bald Eagle nests located in that area, as identified by BLM productivity surveys conducted there every three years.

Page 3-50, Line 35, Section 3.1.8.4 Mitigations: The Final EIS needs to include the Dall sheep lambing area within the Clearwater Mountains and establish a noise sensitive area in that identified location. Identified Dall sheep spring mineral licks also need to be included in the established seasonal flight avoidance areas within the Clearwater Mountain area and upper Susitna drainages.

Page 3-99, Lines 17-18, Section 3.1.13.4 Mitigations, first bullet: We believe that use of aircraft, which has been determined as a customary and traditional use for all federal subsistence communities affected by the Fox 3 and Paxson MOAs expansion/creation, may be significantly affected during open federal subsistence hunting from August 1 through August 31, October 1 through November 30, and January 1 through March 31 (caribou season). Therefore, we recommend in the Final EIS, an extension of the time frame for “No MFEs” to cover the period of August 1 through September 30 in the Fox 3 and Paxson MOAs to avoid the federal subsistence moose season and the first half of the federal subsistence caribou season, the most intensively hunted season. Since the Fox 3 and Paxson MOAs encompass most of unencumbered BLM lands open to federal subsistence hunting, this would help ensure that potential adverse effects on federal subsistence use would be minimized.

Page 3-99, Lines 26-29, Section 3.1.13.4 Mitigations, fourth bullet: The Final EIS needs to (1) specify the time frames for this proposed mitigation; i.e., “Conduct regular meetings with regulating agencies...” and (2) identify what thresholds would be required for the USAF to “adjust flight avoidance locations, or to add new ones.”

Page 3-237, Line 15, Section 3.4.8.1 Affected Environment, Table 3-50: This table references a U.S. Geological Survey (USGS) 2011 publication; however, the publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.

Page 3-330, Lines 23-24, Section 3.7.6.1 Affected Environment: The Draft EIS references USGS surface-water discharge data (USGS 2011-1); however, the data publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.

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Page 4 -27, Line 3, Section 4.8.8 Biological Resources: The Final EIS needs to more fully discuss cumulative impacts to biological resources in the Fox 3 and Paxson MOAs and adjacent areas. With new mineral exploration, large hydro power projects (e.g., the Susitna-Watana project), new oil/gas pipelines, and various other land developments in place or reasonably foreseeable, the cumulative effects of all of these land decisions, in addition to these airspace/temporary ground structures, could have a significant and synergistic effect on many biological resources. Therefore, we believe both direct and indirect cumulative effects issues; geographic scope; timeframe; and past, present, and reasonably foreseeable actions, need to be more fully analyzed for the proposed expansion of Fox 3 and Paxson MOAs.

Pages D-15 and 16, Table D-6 Flight Avoidance Areas: The Table D-6 Flight Avoidance Area entry for row #36 is incorrect. This needs to be corrected in the Final EIS to read “Gulkana” and not “Juliana” National Wild and Scenic River.

While we agree with the Flight Avoidance Areas depicted in Table D-6 for both the Delta and Gulkana National Wild and Scenic River areas (row 19 and row 36 [as corrected], respectively); we believe that the flight ceiling for those areas needs to be changed in the Final EIS to 5,000 feet AGL, rather than 5,000 feet MSL. Because much of the land underneath the Fox 3 and Paxson MOAs is at an elevation of approximately 1,500 to 3,000 feet above sea level (e.g., Paxson is approximately 2,500 feet above sea level), a 5,000 feet MSL ceiling is effectively only 2,000 to 3,500 feet AGL. To preserve the opportunity for solitude, overflight operations in the vicinity of the Gulkana and Delta Wild and Scenic Rivers would need to occur at least 5,000 feet AGL.

In addition, we believe the flight avoidance times of year need to be expanded to include the busy summer recreation and fall hunting seasons. Therefore, the proposed avoidance time of year for the Gulkana and Delta Wild and Scenic Rivers needs to be changed in the Final EIS from June 27 through July 11 to May 15 through September 30. These dates more closely match many of the dates for the other avoidance areas listed, and would offer more opportunities for solitude, since most of BLM’s busiest recreational facilities, as well as the Gulkana Wild and Scenic River, would be underneath the new Paxson MOA.

Pages K-19, 23, and 24, Table K-2 Proposed Mitigations: We believe “Land Use-Recreation” and “Land Use” mitigations identified to occur from June 27 to July 11 and from August 20 to September 30 for MFE operations in the Fox 3 and Paxson MOAs need to be changed in the Final EIS to include the dates of May 15 through September 30. The May 15 through September 30 timeframe dates more closely match many of the dates for the other avoidance areas listed, and offer more opportunities for solitude since most of BLM’s busiest recreational facilities as well as the Gulkana Wild and Scenic River would be contained underneath the new Paxson MOA.

Page K-20, Table K-2 Proposed Mitigations: While we support the avoidance area extending five nautical miles on either side of both the Gulkana and Delta Wild and Scenic River areas, in order to preserve solitude, a 5,000-foot AGL (rather than a 5,000 foot MSL) flight ceiling needs to be included in the Final EIS. We also believe the Final EIS needs to indicate that the expanded avoidance area will be in effect from May 15 through September 30 annually.

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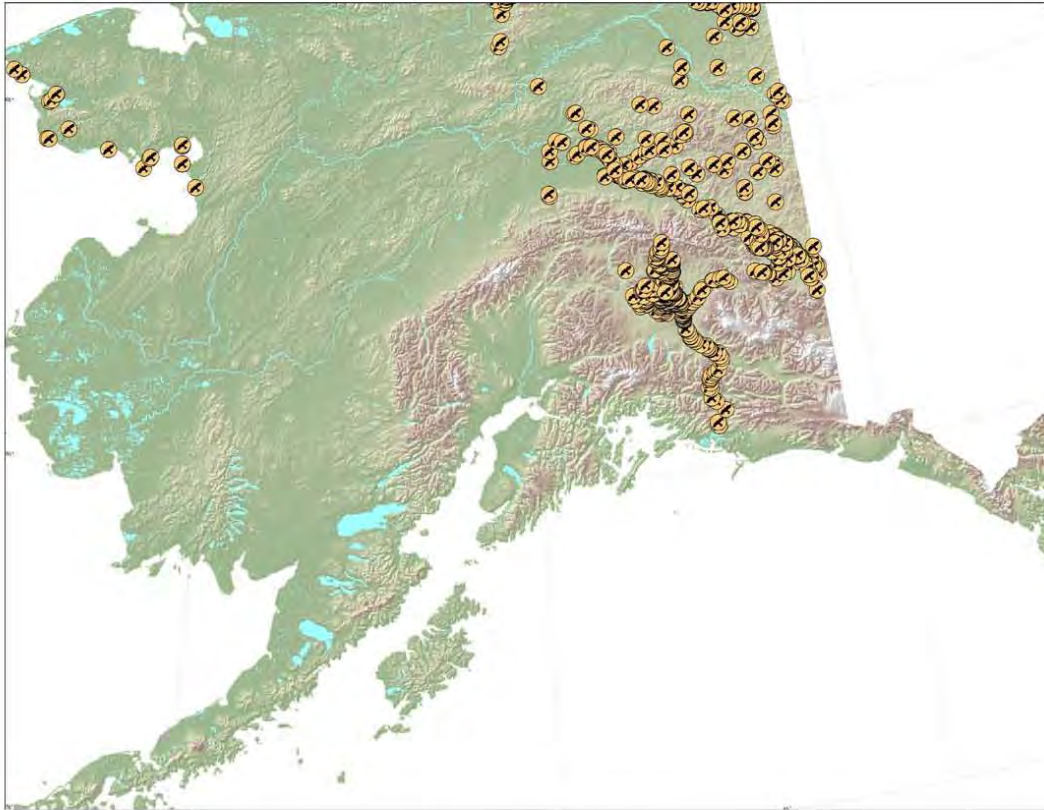
Page K-21, Table K-2 Proposed Mitigations: The Final EIS needs to identify a flight ceiling of 5,000 feet AGL, an avoidance area extending 5 nautical miles, and a timeframe to include May 15 through September 30 for the “Land Use-Recreation” mitigation. This will ensure consistency with previous comments regarding BLM-managed lands and subsistence use areas.

Page K-25, Table K-2 Proposed Mitigations: Because of the importance of reducing or eliminating the potential to ignite wildfires on BLM (and other) lands within these MOAs, we support the mitigations for the release of flares and chaff in the Fox 3 and Paxson MOAs, and recommend specifying in the Final EIS, a release altitude of at least 2,000 feet AGL between October and May, and 5,000 feet AGL between June and September.

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Attachment 2

Map of Historic Eagle Nest Locations



NOTE: GIS shape files and maps to be used in analysis for the Final EIS are available through the Fairbanks Fish and Wildlife Service Field Office. Please contact Jewel Bennett at 907-456-0324.

Attachment 3

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Lieutenant General Stephen L. Hoog
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RE: *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS).*

Dear Sir,

The City of North Pole (CONP) would like to take this opportunity to comment on the Draft *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska.*

The City of North Pole supports the U.S. Air Force and Army and their missions in Alaska and recognizes the need for expanding JPARC to accommodate current and future training needs. The CONP supports the increased use of JPARC, and the planned expansion as it represents no overall negative impact on the community. However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.

The JPARC ranges and facilities far surpass the quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The CONP is proactive in addressing military concerns on JPARC utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.

The CONP believes it is necessary for the State of Alaska and the Department of Defense to continue working closely and cooperatively in order to enhance both the use of the JPARC and the development of the natural resources located within the JPARC, and surrounding environs, for the benefit of the State and its citizens.

The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC

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training scenarios and conduct, and could affect our community's support for JPARC use and expansion. The CONP's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.

Review and Comments from the CONP on the Draft JPARC EIS

The CONP joins with the Fairbanks North Star Borough (FNSB) in the following comments. We understand that four factors are driving the need for enhanced and modernized training and testing facilities at JPARC. These four factors are technological advances; changes in combat tactics and techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the CONP's comments are arranged in a similar format.

Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion

Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.

The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.

While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date fifteen years after the MOAs were expanded aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.

Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

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Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that “funding will be pursued,” given that we still do not have adequate communication in the existing airspace, it is essential that:

- (a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,
 - (b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.
- Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.

Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.

Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

IFR Access to MOA airspace

Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The CONP has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.

Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will

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also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.

When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.

Proposed Realistic Live Ordnance Delivery in proposed restricted area

The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.

Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.

The CONP supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.

Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.

The CONP supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.

Proposed Expansion of R-2205 Restricted Area, including the DMPTR

The CONP supports the expansion of the R-2205 Restricted Area; the airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.

Proposed Night Joint Training in all military special use airspace

The CONP supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.

G0016***Proposed Unmanned Aerial Vehicle (UAV) Corridors***

The CONP is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the CONP would like the final JPARC EIS to develop other options besides segregated airspace.

Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.

The CONP supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The CONP is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The CONP is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.

Proposed Enhanced Access to Ground Maneuver Space Areas

The CONP supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The CONP played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the CONP was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.

Proposed Tanana Flats Training Area Access Road

The CONP supports construction of the Tanana Flats Training Access Road to access the Ground Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.

Proposed Joint Air-Ground Integration Complex

The CONP supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.

Proposed Intermediate Staging Bases

The CONP supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.

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Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska

The CONP supports use of the Gulf of Alaska for training with AIM-9 and AIM-120 missiles.

Proposed Joint Precision Airdrop System

The CONP supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.

Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS

While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.

The JPARC EIS was prepared for anticipated scenarios exclusive of the proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.

The following concerns arise based on the proposed airspace expansions:

1. Cost for "dry targets" in the new airspace.
2. Transit distance for Aggressors to the YUKON range airspace.
3. Travel time vs. play time in the proposed airspace.
4. Erroneous assumption that airspace entry equates to effective airspace use.

The following considerations arise related to environmental analysis and aircraft relocation:

1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace.
2. The JPARC EIS in no way considers the relocation of the Aggressors.
3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing.
4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER.
5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually.
6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL.

The following considerations arise concerning estimated cost savings:

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1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie.
2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally utilized ATC routing.
3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER.
4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft.

Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER to the YUKON 1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.

In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, *Special Use Airspace*. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.

In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.

Expanded Data Points

Airspace Expansions:

1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred.
2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective flight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates – points on the boundaries of the airspace where ATC can initiate or terminate IFR/VFR clearances and issue airspace clearances. These gates can be likened to the

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ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.

The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STQON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.

The possible solutions to the issue of transit distance include, but are not limited to: 1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.

3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEEGL TWO SID from JBER requires approximately 15 minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA, FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.
4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation. Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.

Environmental Study:

1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kullis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kullis relocation, involved

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replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kullis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kullis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area).

2. Chapter 4, *Cumulative Impacts and Secondary Effects*, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15).
3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressors originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.
4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, *Description and Representative Annual Use of Alaska Training Airspace*, reflects FOX3 sortie totals of 9,877. STONY ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16Cs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.
5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.

CONP JPARC EIS RESPONSE

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6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSI) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in non-MFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.

Cost savings:

1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.
2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1 ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.

One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.

3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The


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congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.

4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves – greater reserves for IFR terminal weather – and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.

Thank you for the opportunity to offer comment on the *Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska*. The CONP looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,


Douglas W. Isaacson
Mayor

References:

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RE: *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS).*

Dear Sir,

As Mayor of the Fairbanks North Star Borough (FNSB) I would like to take this opportunity to comment on the Draft *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska.*

The FNSB wholeheartedly supports the U.S. Air Force and Army and their missions in Alaska and welcomes the expansion of the JPARC to accommodate current and future training needs. The FNSB supports the increased use of JPARC, and the planned expansion as this action is beneficial to the community, Alaska Command, and the U.S. Military with no overall negative impact on the community. However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.

The JPARC ranges and facilities located within the FNSB far surpass the quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The FNSB is proactive in addressing military concerns on JPARC utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.

The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC training scenarios and conduct, and could affect our community's support for JPARC use and expansion. The FNSB's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.

Review and Comments from the FNSB on the Draft JPARC EIS

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techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the FNSB's comments are arranged in a similar format.

Proposed Paxson MOA Addition and Proposed Fox 3 Military Operations Area Expansion

Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.

The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.

While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date—fifteen years after the MOAs were expanded—aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.

Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that “funding will be pursued,” given that we still do not have adequate communication in the existing airspace, it is essential that:

- (a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,
- (b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.

Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community.

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The FNSB is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.

Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.

Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

IFR Access to MOA airspace

Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The FNSB has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.

Recommendation : We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.

When military exercises are planned that would close either MOA, the FNSB would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. FNSB residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.

Proposed Realistic Live Ordnance Delivery in proposed restricted area

The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.

Recommendation : The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas

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making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.

The FNSB supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.

Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.

The FNSB supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.

Proposed Expansion of R-2205 Restricted Area, including the DMPTR

The FNSB supports the expansion of the R-2205 Restricted Area; the airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.

Proposed Night Joint Training in all military special use airspace

The FNSB supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.

Proposed Unmanned Aerial Vehicle (UAV) Corridors

The FNSB is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the FNSB would like the final JPARC EIS to develop other options besides segregated airspace.

Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.

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The FNSB supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The FNSB is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The FNSB is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.

Proposed Enhanced Access to Ground Maneuver Space Areas

The FNSB supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The FNSB played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the FNSB was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.

Proposed Tanana Flats Training Area Access Road

The FNSB supports construction of the Tanana Flats Training Access Road to access the Ground Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.

Proposed Joint Air-Ground Integration Complex

The FNSB supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.

Proposed Intermediate Staging Bases

The FNSB supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.

Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska

The FNSB supports use of the Gulf of Alaska for training with AIM-9 and AIM-120 missiles.

Proposed Joint Precision Airdrop System

The FNSB supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.

Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS

While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.

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The JPARC EIS was prepared for anticipated scenarios exclusive of the proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.

The following concerns arise based on the proposed airspace expansions:

1. Cost for "dry targets" in the new airspace.
2. Transit distance for Aggressors to the YUKON range airspace.
3. Travel time vs. play time in the proposed airspace.
4. Erroneous assumption that airspace entry equates to effective airspace use.

The following considerations arise related to environmental analysis and aircraft relocation:

1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace.
2. The JPARC EIS in no way considers the relocation of the Aggressors.
3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing.
4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER.
5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually.
6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL.

The following considerations arise concerning estimated cost savings:

1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie.
2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally utilized ATC routing.
3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER.
4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft.

Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER to the YUKON1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.

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In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.

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Airspace Expansions:

1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred.
2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates – points on the boundaries of the airspace where ATC can initiate or terminate IFR /VFR clearances and issue airspace clearances. These gates can be likened to the ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.

The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STOON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.

The possible solutions to the issue of transit distance include, but are not limited to: 1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.

3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEGL TWO SID from JBER requires approximately 15 minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA,

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FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.

4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation. Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.

Environmental Study:

1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kulis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kulis relocation, involved replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kulis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kulis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area).
2. Chapter 4, *Cumulative Impacts and Secondary Effects*, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15).
3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressor's originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.
4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, *Description and Representative Annual Use of Alaska Training Airspace*, reflects FOX3 sortie totals of 9,877. STONY

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ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16CJs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.

5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.
6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSL) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in non-MFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.

Cost savings:

1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.
2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point

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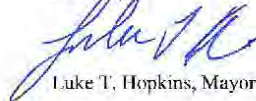
of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1 ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.

One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.

3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.
4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves – greater reserves for IFR terminal weather – and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.

Thank you for the opportunity to offer comment on the *Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska*. The FNSB looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army. The FNSB point of contact for this action is Jeff Jacobson, Chief of Staff, jjacobson@fnsb.us 907-459-1300.

Sincerely,



Luke T. Hopkins, Mayor

References:

- Air Force (U.S. Air Force). 2010. 11th Air Force Airspace Handbook. 29 December.
- ALCOM (Alaskan Command). 2012. Joint Pacific Alaska Range Complex Environmental Impact Statement, Joint Base Elmendorf Richardson, Alaska, March.
- FAA (Federal Aviation Administration). 2011. Administrator's Fact Book, U.S. Department of Transportation. March.
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THE STATE
of **ALASKA**
GOVERNOR SEAN PARNEILL

Department of Transportation and
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July 9, 2012

ALCOM Public Affairs
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Re: *JPARC Modernization & Enhancement Draft EIS*

To whom it may concern,

Thank you for the opportunity to comment on the *Joint Pacific Alaska Range Complex (JPARC) Modernization & Enhancement Draft Environmental Impact Statement (DEIS)*. The Alaska Department of Transportation and Public Facilities' (DOT&PF) mission is to *Get Alaska Moving* through service and infrastructure. We do this by providing for the safe and efficient movement of people and goods and delivery of state services. In this regard we will comment on safe access and the potential impacts on aviation by the proposed actions. Other State of Alaska departments are providing comments on various aspects of the DEIS that fall within their purview. It is in this context that I provide comments to you on the JPARC DEIS.

Alaska and the military have a long and mutually beneficial history, and the State of Alaska wants to preserve and expand our relationship wherever possible. Alaska's unique and spacious environment already provides superb military training opportunities and we support and endorse modernization and enhancement of this unique capability to support the Department of Defense (DoD) for the next century. It is in Alaska's best interest to seek creative methods to share the combination of air, ground, and sea resources that provide a realistic training environment for the military. While we desire to be both a gracious host and a partner with the military in Alaska, we have concerns about some of the proposed actions in the JPARC DEIS that must be addressed in the National Environmental Policy Act (NEPA) process.

Importance of Aviation in Alaska

We like to say that in Alaska, the general-aviation small aircraft is the equivalent to the mini-van for people living in the contiguous 48 states. There are over 10,000 aircraft in Alaska and over six times as many pilots per capita when compared to the rest of the U.S.A. Furthermore aviation is a major

"Get Alaska Moving through service and infrastructure"

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economic force by contributing more than \$3.5 billion annually to our economy, or about 8% of gross state product. Aviation is the fifth largest employment sector in Alaska, with over 47,000 aviation related jobs. Perhaps most importantly, aviation is the essential means of access to rural Alaska because of our expansive geography.

Safe Access

Providing for the safe transportation of the flying public in Alaska is a very important part of the State's responsibility. We want to help create a culture of safe travel in Alaska. The number of aircraft mid-air collisions is disturbingly high, which we want to eliminate or at least reduce the potential causes of whenever possible.

We believe it would be beneficial for the DoD to articulate and explain the on-board sensing capability possessed by military aircraft, as well as help Alaska stakeholders understand the relative frequency of military operations below 5,000 feet agl. These explanations should go a long way towards addressing concerns of Alaska general aviation and commercial operators.

These explanations are especially important due to the need for access to the southern Alaska Range, Denali Highway, and Talkeetna Mountains. Furthermore Isabel Pass is a major VFR "highway in the sky" that connects the northern half with the south central and southeastern portions of Alaska. The proposal to establish restricted air space over the Battle Area Complex (BAX) southeast of Delta Junction is of notable concern to state stakeholders as well. The concept of "turn on/turn off" airspace has been articulated by the DoD in past discussions. How might this concept apply to the BAX restricted airspace?

Enhance Communications for Safety

DoD created the Special Use Airspace Information Service (SUAIS) in the mid-1990's to address deconfliction of air space use. SUAIS greatly reduced the potential for mid-air collisions between civil and military aircraft. While both civil and military organizations generally agree upon the value SUAIS provides for deconflicting aircraft, to date aviation organizations continue to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.

Any expansion of MOA airspace should have accompanying radio coverage, staffing, and other elements of the SUAIS infrastructure to allow civil pilots to communicate with US Air Force Range Control during times the MOAs area active. It is also important that the audio recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex.

Unmanned Aerial Vehicles

We provided comments for the scoping phase of the JPARC EIS regarding Unmanned Aerial Vehicles (UAVs), and want to reiterate our concerns. UAVs clearly represent an important and growing technology for the military and other agencies. We think now is the time to address how UAVs might be employed in a training environment while simultaneously ensuring safe separation from traditional aircraft. We believe an Alaska-as-prototype methodology is possible in meeting the challenge if all stakeholders work together to achieve the best approach. We look forward to participating with Department of Defense (DoD) planners in this area. The University of Alaska is working to secure a

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UAV training area under the auspices of the FAA. Perhaps DoD and the University of Alaska could work together to improve UAV safety.

Conclusion

Alaska has a long, productive, and collaborative history with the U.S. military. We want to build upon our history and continue to provide the remarkable environment for realistic military training opportunities so that our military can continue to be the best trained forces in the world. It is in both Alaska's and DoD's best interests to seek cooperative solutions to be able to share the unique combination of air, ground, and sea resources found in Alaska in a safe and mutually beneficial way.

The State of Alaska wants to continue to be both a gracious host and a full partner with the DoD in Alaska; however we have concerns and needs that must be addressed in the EIS and Record of Decision. I believe we can meet both the military's need for realistic training while ensuring that Alaskans continue to have reliably safe access to the areas within the proposed expanded MOAs.

Sincerely,



Steven D. Hatter
Deputy Commissioner - Aviation

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From: Jim DeWitt [REDACTED]
Sent: Friday, July 06, 2012 5:27 PM
To: ALCOM J08 Admin Box
Cc: Mike Tvenge; Peter Hallgren; Mary Leith; Dennis J. Dunn
Subject: Joint Pacific Alaska Range Complex EIS - Comments of the City of Delta Junction
Attachments: DeltaJPARC-DEISComments.pdf

Dear Sir or Madam -

I am the City Attorney for the City of Delta Junction, Alaska. Enclosed is a PDF of a letter dated July 6, 2012, from the City commenting on the proposed Modernization and Enhancement Draft Environmental Impact Statement.

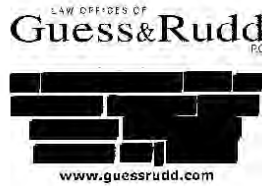
By copy of this email, I am advising Dennis Dunn of the City's comments, insofar as they relate to the City's claim of breach of the 2006 Agreement described in the enclosed letter.

Please contact me if you have questions.

Jim DeWitt, City Attorney
City of Delta Junction, Alaska

G0019

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CHRISTINA RANKIN
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KRISTIN E. BRYANT



W. EUGENE GUESS 1932-1975
JOSEPH RUDD 1839-1978
FRANCIS E. SMITH, JR. 1941-1991

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OF COUNSEL
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Via U.S. Mail and Email:
alcom.j08@elmendorf.af.mil

July 06, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
Joint Base Elmendorf-Richardson, Alaska 99506

Re: Joint Pacific Alaska Range Complex
Modernization and Enhancement
Draft Environmental Impact Statement
Comments of City of Delta Junction, Alaska
Our File No. 11025.020

Gentlemen:

We are city attorneys for the City of Delta Junction, Alaska. We submit these comments to the *Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska* ("JPARC DEIS"). The comments submitted here are in addition to the City's claims for breach of the Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"). Neither these comments nor the City's participation in the JPARC DEIS process is a waiver by the City of those breaches.

The City believes that the context for its comments is critical and will provide background. The U.S. Army has admitted that changes in staffing at the U.S. Army have cost the Army its historical context.

I. BACKGROUND

The City of Delta Junction ("Delta") is a general law city located immediately to the north of the Donnelly Training Area East and Ft. Greely. The surrounding area along the Richardson Highway and the Alaska Highway, outside of Delta, is home to several thousand additional citizens ("Deltana").

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Beginning in 2001, United States Army Alaska ("USARAK") sought to develop two training facilities in the Eddy Drop Zone of the Donnelly Training Area East, the Combined Arms Collective Training Facility ("CACTF") and the Battle Area Complex ("BAX"). The proposed location for the CACTF and BAX was immediately adjoining the southern city limits of Delta and a considerable stretch of Deltana along the Alaska Highway. Through a series of disputes in the context of the National Environmental Policy Act, Delta objected to and resisted the location of the CACTF and BAX so close to populated areas. Some of the history of those objections and the background to their resolution are described in Delta Ordinance 2006-06 ("the 2006 Ordinance"), attached as Exhibit A, and Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"), attached as Exhibit B. More detailed discussion and analyses can be found in the City's comments to the various environmental impact documents, the pleadings filed in federal court and the working papers leading to the 2006 Agreement.

The City argued strongly for an alternate location for the CACTF and BAX, at the south end of the Donnelly Drop Zone, described as "Alternative 3" in the Supplemental Draft Environmental Impact Statement for the Construction and the operation of a Battle Area Complex and a Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska dated March 2006 ("the 2006 SDEIS").¹ USARAK objected to Alternative 3 because of added costs of construction, as detailed in the 2006 SDEIS. USARAK insisted on Alternative 2 in the 2006 SDEIS, the "preferred alternative," which adjoins Delta and Deltana.²

An agreement was reached: Delta would withdraw its objections to Alternative 2 in exchange for commitments from USARAK for public safety, and USARAK's agreement that use of the CACTF and BAX would not be further expanded without the consent of Delta. The agreement was reduced to the writing attached as Exhibit B, and approved by the City under Ordinance 2006-06, attached as Exhibit A.

Note that to interpret the 2006 Agreement you must have at hand both Exhibit A to the 2006 Agreement and the 2006 SDEIS itself, which both the 2006 Agreement and Exhibit A to the 2006 Agreement reference.

¹ 2006 SDEIS, Vol. 2, Figure 2.f.

² 2006 SDEIS, Vol. 2, Figure 2.e.

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Much of the activity described in the JPARC DEIS is removed from the Delta and Deltana area, although the JPARC DEIS is vague about many of the impacts. However, many parts of the JPARC DEIS are specific to the Donnelly Training Area and to the BACX and CACTF in particular. Generally, Delta's comments to the JPARC DEIS go to the environmental impacts on the Donnelly Training Area East. To the extent that other aspects of the JPARC Modernization and Enhancement carry the potential to impact Delta and Deltana, those comments are intended to extent to those changes as well.

II. COMMENTS

A. Comments Related to Memorandum of Agreement USARAK-MOA-029.

It is very frustrating to Delta to have to discuss and review all of these issues again.

1. The JPARC DEIS Is Defective Because JPARC Failed to Consult with Delta As a Local Government Impacted by the Proposed Activity.

As the JPARC DEIS acknowledges, consultation with local governments impacted or potentially impacted by the proposed activities is mandatory.³ That simply did not happen. Indeed, Delta did not even make the distribution list for local agencies impacted.⁴ Given the troubled history of range expansion between USARAK and Delta, the omission is inexcusable. Delta and Deltana are the areas most likely to be impacted by increased activities in the Donnelly Training Area. The failure to contact and consult with Delta is an astonishing oversight.

Delta has litigated the adequacy of NEPA documents with USARAK. Delta has vigorously participated in NEPA proceedings on the 2001 Environmental Assessment for the CACTF and BAX, forcing USARAK to a full environmental impact statement process. Delta's comments to the Draft Environmental Impact Statement for the CACTF and BAX contributed to USARAK's decision to issue a Supplemental EIS. Delta, without question, is the municipality with the most at stake in any expansion of activities in the Donnelly Training Range.

The failure to consult with a major stakeholder, with a record of active participation in prior range expansions, makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

³ JPARC DEIS, Vol. 1, p. 1-33.

⁴ JPARC DEIS, Vol. 2, p. A-45.

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2. The JPARC DEIS Is Defective Because JPARC Failed to Discuss the 2006 Agreement.

At no point in the JPARC DEIS that we can find does JPARC even mention the specific terms of the 2006 Agreement.⁵ The omission is astonishing, because city council member Pete Hallgren handed a copy of the 2006 Agreement to JPARC at a scoping meeting. JPARC had actual notice of the existence of the 2006 Agreement, quite apart from USARAK being a party to it.

Yet JPARC failed to acknowledge the consequences of the 2006 Agreement, let alone discuss the impact of the commitments made in that agreement to Delta and Deltana. Because of that omission, substantial portions of the discussion of proposed changes to the BAX in the JPARC DEIS ignore the contractual commitments made in the 2006 Agreement.⁶ Among other issues, the proposed level of increased activities ignores the restrictions on training under specific weather conditions because of fire hazards, ignores known flood plain risks and ignores restrictions and limitations on noise and training activities.

This omission is separate from the breaches of the 2006 Agreement. The 2006 Agreement is a part of the scope of the proposed range enhancements. It is an issue to be addressed as a part of any environmental impact statement. The omission of the 2006 Agreement from the JPARC DEIS makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

⁵ The JPARC DEIS briefly acknowledges the existence of the 2006 Agreement; JPARC DEIS p. 3-206, lines 31-33. The reference cites to the wrong USARAK number. Nowhere in the hundreds of pages of the JPARC DEIS are the terms of the 2006 Agreement discussed, or analyzed in relation to the JPARC DEIS.

⁶ JPARC DEIS, vol. 1, 3-178 to 220

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B. Comments Relating to Fire Danger.

As Delta demonstrated in the negotiations and litigation over the BAX and CACTF Ranges, the risks associated with wildfire are a critical concern. Very strong winds gust through the Black Rapids Canyon, Deltana and Delta routinely. Hot, dry conditions can extend for weeks at a time. A wildfire in those conditions is uncontrollable. Delta experienced just such a wildfire in 1999, when a wind-driven fire originating in the Donnelly Training Area East burned buildings on Ft. Greely and blew hot cinders several miles downwind. Uncontrollable wildfire originating from training activities is a critical concern.

The presence of unexploded ordinance in portions of Donnelly Training Area East exacerbates the dangers from wildfire in training areas. Where a danger of unexploded ordinance is present, ground crews cannot be used to attempt to control the wildfire. Only aerial systems (air drops of water and fire retardant) can be used. Thus, efforts to control wildfire may be further hampered.

The importance of those concerns is reflected in the 2006 Agreement. Substantial portions of that agreement address mitigating the risk of wildfire and providing for immediate, on-site control if a fire is started. The mitigation and control requirements demonstrate the significance both USARAK and Delta attach to this risk.⁷

Note that under extreme fire conditions, no training would occur at the BAX except for troops scheduled for immediate deployment and then only after prior consultation with Delta.⁸ For lower levels of fire conditions, specific levels of staffing and staffing locations are provided.

By contrast, the discussion of fire danger associated with the proposed JPARC Range Enhancement is incomplete and inadequate. The only consideration given to wildfire is fires ignited by munitions and incendiaries, and even that inadequate discussion is cast as nearly meaningless generalities.⁹ Wildfires can also be ignited by careless smoking, exhaust manifolds on vehicles, escaped campfires and many other sources. The failure to address other man-made causes

⁷ See 2006 Agreement, pp. 3.4.

⁸ Ibid, p. 3.

⁹ See, e.g., JPARC DEIS 3-118 to 119.

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of wildfire makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

The proposal to increase training activities from 106 days annually to 238 days annually¹⁰ is effectively an impossibility without violating the 2006 Agreement or greatly increasing training activities during the harsh Interior Alaska winter. A 225% increase is not feasible.

Because wildfire is uncontrollable in high and extreme weather conditions, and because those kinds of weather conditions prevail in the Donnelly Training Area for days and sometimes weeks at a time, the goals of the BAX Range Expansion cannot be met without extremely high jeopardy of wildfire. The failure of the JPARC DEIS to address these environmental realities makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Delta notes that the solution to the wildfire risk is not to offer more staffing or more equipment, or even more removal of vegetation. Under high and extreme fire conditions, wildfire is *uncontrollable*. The only means of "controlling" wildfire risk in high and extreme conditions is to sharply curtail human activity in the Donnelly Training Area. That single solution is contradicted by the overly ambitious training days goal described in the JPARC DEIS. The failure by the JPARC DEIS to directly address that contradiction makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

C. Comments Relating to Flooding.

As Delta demonstrated from historical records and from the work of an independent hydrologist, the area where USARAK chose to locate the BAX and CACTF are prone to sheet flooding and aufeis-generated seasonal flooding. Those risks were addressed in the 2006 Agreement and Exhibit A to the Memorandum.¹¹

"Sheet flooding" is an unusual condition that occurs in the Donnelly Training Area East in which instead of channelized flow, water flows over the entire area. Man-made structures disrupt and channelize that sheet flow, creating very serious downstream risks. Delta, and the Deltana region, are downstream.

¹⁰ JPARC DEIS, p. 6.

¹¹ 2006 Agreement, p. 4; Exhibit A, pp. 2-3.

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"Aufeis-generated seasonal flooding" occurs in the Jarvis Creek channel, which flows south to north through the Donnelly Training Area East. The risk is mentioned but not assessed in the JPARC DEIS.¹² In the Executive Summary, the JPARC DEIS ultimately concluded that the BAX will have no adverse impact on the flood plain.¹³ That unsupported claim stands in sharp contrast to events on the ground. In the spring of 2006, an aufeis event occurred on Army land, that caused a massive diversion of spring runoff from Jarvis Creek, overland through the BAX site and then more than 10 miles through the Delta and Deltana area north to ultimately discharge into the Tanana River. This rapidly rising floodwater ran down the street in front of the Delta High School as volunteer crews using heavy equipment dug emergency ditching to keep the water from flowing into residential neighborhoods and downtown Delta, while miles to the north State of Alaska Department of Transportation deliberately breached Tanana Loop Extension road in several places to allow the floodwater to more quickly drain into the Tanana River. A number of residents were stranded for several days in their homes due to this action. Anything that alters the topography in Donnelly Training Area East, including the range expansions contemplated by the JPARC DEIS, carries the risk of worsening the risk of aufeis-generated flooding, disruption of the sheet flow flooding or both.

USARAK acknowledged these risks and partially addressed them in the 2006 Agreement.¹⁴ The unspecified enhancements to the BAX contemplated by the JPARC DEIS involve a careful assessment of what changes will be made to the Jarvis Creek channel, the alternate flood channel and the areas prone to sheet flooding. The failure of the JPARC DEIS to meaningfully discuss these risks makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

In the case of both sheet flow and aufeis-generated flooding, it is important that vegetation remain in place to slow and impound the velocity of the water. Delta notes that this important requirement is inconsistent with removal of that vegetation to manage the risk of wildfire. The failure of the JPARC DEIS to address this inconsistency makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Because the area in which the BAX is located is in a known flood plain, Executive Order 11988 bars construction unless there is no

¹² JPARC DEIS, §3.3.6.1 at p. 3-195.

¹³ JPARC DEIS, vol. 1, p. 12, Table ES-1.

¹⁴ 2006 Agreement, p. 4.

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practicable alternative. A word search of the JPARC DEIS demonstrates that Executive Order 11988 is never mentioned in the discussion of the BAX, and only briefly acknowledged to exist in Volume 2 of the JPARC DEIS.¹⁵ There is no discussion of the relationship of Executive Order 11988 to the proposed BAX range expansions. The failure by the JPARC DEIS to meaningfully discuss the risks of construction in a floodplain and the impact of EO 11988 makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Aufeis occurs throughout the flatter areas in Donnelly Training Area East. As Delta has demonstrated previously, any structures that impede the flow of water, even relatively small amounts of water, create potential for aufeis formation during the winter. Over the course of the long Alaska winter, that aufeis can thicken into layers many feet thick. That aufeis not only jeopardizes whatever structures may have been created; it also impacts the flow of water during spring runoff in unpredictable ways.

The JPARC DEIS baldly claims that the BAX range expansions will have no adverse impact on water resources or flood plains.¹⁶ The assertion is simply wrong. These cumulative risks identified by Delta as far back as 2005 demonstrate that there are very serious hydrologic risks. These are risks, which USARAK acknowledged to exist in the 2006 Agreement. For the JPARC DEIS to claim otherwise now makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

D. Comments Relating to Public Safety.

The Donnelly Training Area East directly abuts the southern boundary of Delta and, along the Richardson and Alaska Highways, the Deltana region. Delta and Deltana will bear significantly increased safety risks from the proposed range enhancements. The risks go beyond the wildfire and flood risks described earlier in this letter. The increased overflights, increased air-to-ground and ground-to-air weapon activity, increased unmanned aerial vehicle activity and increased night training all pose safety risks for Delta and Deltana.

¹⁵ JPARC DEIS, Vol. 2, p. B-48. This omission is particularly frustrating to Delta. In 2005-2006, in the discussions regarding the adequacy of the Supplemental Draft Environmental Impact Statements, it was Delta that had to point out the existence of Executive Order 11988 to USARAK. It is frustrating, even alarming, that JPARC has apparently already forgotten its existence.

¹⁶ JPARC DEIS, §3.3.6 at p. 3-195.

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Yet Delta was not meaningfully consulted. And to the extent that Delta participated in the scoping meetings, by providing a copy of the 2006 Agreement, for example, it was simply ignored. The failure by the task force charged with drafting the JPARC DEIS to even consult with Delta makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

The JPARC DEIS acknowledges that existing activities generate munitions-related rubble in the BAX.¹⁷ Munitions-related rubble contains hazardous materials. The JPARC DEIS concludes that there will be no increased adverse impact. Delta is at a loss to understand how a proposed 225% increase in training activities can fail to substantially increase the amount of munitions-related rubble. That rubble, apparently, is stored on the Donnelly Training Area, at or near the BAX. As such, it presents a risk to Delta in the event of a flood event, to give just one example. Unless JPARC can show that Delta's assumptions are in error, the failure by the JPARC DEIS to address this issue makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Finally, it is deeply troubling to Delta that JPARC is using the location of the CACTF and the BAX as a basis for increased air activity over inhabited areas. As described earlier in this letter, the basis for Delta's entry into the 2006 Agreement was the agreement that in exchange for acquiescing in the BAX and the CACTF being at the north end of the Donnelly Training Area East, as opposed to the south end favored by the City, the use of those ranges would not be expanded without the agreement of Delta. The failure by the JPARC DEIS to meaningfully discuss the breach of that bargain and the increased risk to Delta and Deltana makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

E. Comments Relating to Noise.

The importance of noise and noise management is evident in the 2006 Agreement: the agreement was predicated on a demonstration of the noise from a 105mm Stryker Mobile Gun System immediately prior to the public hearing on the ordinance to adopt the 2006 Agreement. Additionally, the JPARC DEIS concluded that there is a potential adverse impact

As Delta understands the JPARC DEIS, the BAX range expansion contemplates a 225% increase in training days, greatly increased amounts of fixed and rotary wing air traffic, some of it jet traffic,

¹⁷ JPARC DEIS, §3.3.7 at pp. 3-196 to 3-197.

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immediately above and along the southerly boundary of Delta. The hours during which the activity would occur are greatly increased. Night training would be added, creating noise issues into the evening.

This would not be as great an issue if USARAK had agreed to locate the BAX and CACTF at the south end of Donnelly Training Range East. But USARAK insisted on the very northern end, abutting the City limits, and promised noise would not be an issue. Now, apparently, residents of Delta and Deltana can expect helicopter traffic 500 feet overhead at 10 PM two-thirds or more of the year.

The JPARC DEIS admits that the EPA has determined noise levels above 55 dB are annoying to adjoining property owners.¹⁸ Further, the JPARC DEIS recognizes that the noise from the BAX will potentially have an adverse impact on the environment surrounding it.¹⁹ But the JPARC DEIS goes on to assert, without citation to authority, that levels of 65 dB are permissible, even though it means that 12% or more of the population will be highly annoyed.²⁰ The activities described in the JPARC DEIS also represent a substantial increase in noise levels for residents of Delta and Deltana. Under the 2006 Agreement, Delta agreed to tolerate noise below 65 dB.²¹ Now Delta residents are being told to expect noise "that would not be expected to exceed 65 dB."²² Delta knows from experience that changes in phrasing like this are a wedge to much higher activity levels. The proposed increase in tolerated levels of noise is a breach of the 2006 Agreement. No justification is offered for this breach of the 2006 Agreement. The failure by the JPARC DEIS to address the unilateral increase in noise levels and noise duration makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

F. Relationship Between City of Delta Junction and U.S. Army.

Delta prides itself on a long, mutually cordial and mutually beneficial relationship with the U.S. Army. Many Delta and Deltana residents are veterans, most of whom were stationed at Ft. Greely during their military careers. Delta values that relationship and does not want to unnecessarily damage it.

¹⁸ JPARC DEIS, Vol. 2, pp. E-14 to E-15.

¹⁹ JPARC DEIS, Vol. 1, p. 12, Table ES-1.

²⁰ JPARC DEIS, Vol. 2, pp. E-14 to E-15.

²¹ 2006 Agreement, Exhibit A, pp. 5-6.

²² JPARC DEIS, Vol. 1, pp. 3-187 to 3-188.

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Delta is also mindful of the risk that Eielson Air Force Base may be reduced in size, or even realigned, and understands the importance of adequate training facilities and conditions to the continued operation of the Base.

Finally, Delta is mindful of the importance of adequate training to our troops, for their safety and security, and to allow them to perform the missions that may be assigned to them.

Delta took those considerations in mind when it made the settlement described in the 2006 Agreement. Some of the factors that led to Delta's agreement in 2006 were the very considerations described above.

Now, however, in the face of the U.S. Army's apparent abandonment of the 2006 Agreement, it is difficult for Delta to once again make concessions that jeopardize its safety and values. It is deeply troubling that, despite having a copy of the 2006 Agreement provided at the scoping meeting, JPARC chose to completely ignore its existence and the contractual obligations made by USARAK under that agreement. From the point of view of Delta, the U.S. Army has breached and proposes to further breach its agreement with the City.²³

G. Conclusion.

In light of these circumstances, a further issue that the JPARC DEIS should address is how a level of trust and confidence between the U.S. Army and Delta may be restored. Delta would strongly prefer to resolve these issues by compromise and agreement, but is understandably concerned that USARAK, JPARC and the U.S. Army will not abide by whatever agreement might be made. The City of Delta Junction invites the U.S. Air Force and the U.S. Army to suggest ways in which some settlement can be made.

As drafted, Delta believes the DEIS is inadequate as a matter of law. A Supplemental Environmental Impact Statement, with further notice and comment periods, is very likely required. Separately, the City and Delta Junction must resolve the very serious breaches of the

²³ At the public hearing in Delta Junction, the military suggested that because the JPARC DEIS is a joint effort of the Air Force and Army, the 2006 Agreement might not apply. The claim is wrong as a matter of law. Donnelly Training Area East was USARAK land at the date of the 2006 Agreement. Whatever rights the Air Force may have can only derive from those the Army has. Those rights are limited by the 2006 Agreement.

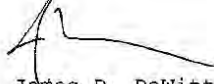
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2006 Agreement. Otherwise, the important objectives of the JPARC DEIS will be delayed, at least as to the BAX modifications, while the NEPA requirements are satisfied, and, at least potentially, an action for breach of the 2006 Agreement ensues. Delta strongly urges meeting to resolve these issues without another five year cycle of environmental and contract litigation.

Sincerely yours.

GUESS & RUDD P.C.



James D. DeWitt

cc: Mary Leith, Mayor
City of Delta Junction

Mike Tvenge, City Administrator
City of Delta Junction

Dennis Dunn, (via email only, dennis.j.dunn2.civ@mail.mil)
USARAK G3, TSS Chief

G0020

[REDACTED]

From: Brenda Henry [REDACTED]
Sent: Friday, July 06, 2012 7:08 PM
To: ALCOM J08 Admin Box; SMART, JOAN M GS-11 USAF ALCOM JTF AK/J08
Cc: Lonnie McKechnie
Subject: Matanuska-Susitna Borough Resolution Serial No. 12-076
Attachments: RS 12-076.pdf

Importance: High

Good Afternoon:

Attached to this email you will find a copy of Matanuska-Susitna Borough Resolution Serial No. 12-076, providing comment on the March 12, 2012, Joint Pacific Alaska Range Complex Environmental Impact statement.

If you have any questions please let us know through the contact information provided below.

Thank you.

Brenda J. Henry
Clerk's Office
Matanuska-Susitna Borough

[REDACTED]

"Who can truly harm you if you are deeply committed to doing what is right?"

G0020

Sponsored By: Assemblymember Keogh
Amended: 06/28/12
Adopted: 06/28/12

**MATANUSKA-SUSITNA BOROUGH
RESOLUTION SERIAL NO. 12-076**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY PROVIDING PUBLIC COMMENT ON THE MARCH 12, 2012, JOINT PACIFIC ALASKA RANGE COMPLEX ENVIRONMENTAL IMPACT STATEMENT REGARDING THE EXPANSION OF EXISTING MILITARY OPERATING AREAS WITHIN THE MATANUSKA-SUSITNA BOROUGH BOUNDARIES AND ADJACENT AREA, PARTICULARLY THE FOX 3 MILITARY OPERATING AREA AND THE PAXSON MILITARY OPERATING AREA.

WHEREAS, the United States Air Force and United States Army are proposing to modernize, enhance, and expand the Joint Pacific Alaska Range Complex, (JPARC); and

WHEREAS, the Matanuska-Susitna Borough is supportive of the United States military presence in Alaska and recognizes its needs for training; and

WHEREAS, much of the existing Fox 3 Military Operation Area (MOA) is situated within the external boundaries of the Matanuska-Susitna Borough; and

WHEREAS, the United States Air Force and the United States Army are requesting public comment on its a draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska; and

WHEREAS, the Matanuska-Susitna Borough is the fastest growing area in the state of Alaska; and

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WHEREAS, the Matanuska-Susitna Borough population is expected to double in the next 20 to 25 years; and

WHEREAS, all the proposed alternatives, except the No Action Alternative, consist of increases in combat flight training exercises within airspace above the Matanuska-Susitna Borough; and

WHEREAS, the proposed Fox 3 MOA and Paxson MOA would expand the existing training airspace southerly, extending to much of the Talkeetna Mountains areas adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View; and

WHEREAS, expansion of the existing Fox 3 MOA and Paxson MOA airspace easterly could encompass the community of Lake Louise and the adjacent areas of Lake Susitna, Lake Tyone, and Crosswind Lake; and

WHEREAS, there are approximately 500 private property parcels and 80 year round residents in the greater Lake Louise area; and

WHEREAS, the Lake Louise Community Non-Profit Corporation, that represents property owners and residents of the greater Lake Louise area has expressed its many concerns about noise impacts on the local economy, lifestyle, wildlife, recreational use, aviation, etc., by letter correspondence dated

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February 11, 2011, to the Borough Assembly, and June 2, 2012, to the Alaskan Command; and

WHEREAS, the Talkeetna Community Council has expressed its concerns about civilian aviation safety and the undesired impacts of noise on the tourism industry and wildlife by letter correspondence dated June 4, 2012; and

WHEREAS, many Matanuska-Susitna Borough residents and visitors depend upon the airspace within the proposed expanded airspace, as well as the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter/hiker guiding, operating lodges, operating mines, etc., and for various non-commercial, recreational, and subsistence activities, such as hunting, hiking, food gathering, sightseeing, etc.; and

WHEREAS, there exists an abundance of wildlife resources within the area proposed for expansion; and

WHEREAS, the proposed expansion of the Fox MOA airspace would cover the Nelchina caribou herd calving grounds, all of which is located within the boundaries of the Matanuska-Susitna Borough; and

WHEREAS, the proposed lateral expansion of the current Fox 3 MOA would enlarge the military operating area within Borough boundaries by an estimated 5,500 square miles in Alternative "A"

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and by an estimated 3,500 square miles in Alternative "E;" and

WHEREAS, the United States Air Force, in its August, 1995, "Final Environmental Impact Statement - Alaska Military Operations Areas," and Record of Decision that followed in April, 1997, diminished the Fox MOA by 910 square miles to its present location and dimension due to undesirable impacts of noise; and

WHEREAS, the proposals will expand airspace vertically to include training areas between 500 feet Above Ground Level (AGL) and 18,000 feet above Mean Sea Level (MSL); and

WHEREAS, the United States Air Force, in its August, 1995, "Final Environmental Impact Statement - Alaska Military Operations Areas," and Record of Decision that followed in April, 1997, raised the proposed minimum flight altitude from 3,000 feet AGL to 5,000 feet AGL due to undesirable noise impacts and in order to "preclude the potential for direct over flight of sensitive resources"; and

WHEREAS, proposed lateral and vertical expansions of training airspace would increase the probability of conflict between civilian and military aircraft; and

WHEREAS, the potential for near misses or midair collisions between military and civil aviation within the proposed Fox 3 and Paxson MOA, is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these

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areas for hunting, fishing and other recreational and subsistence activities who travel at low altitudes under Visual Flight Rules (VFR); and

WHEREAS, general aviation, air taxi, and air charter pilots flying under Instrument Flight Rules (IFR) conditions would be prohibited from travel through an active MOA, the Richardson Highway is a major aviation transportation corridor for civil aviation traveling north-south, and IFR air travel will be impacted during military operations in the proposed Paxson MOA where the low sector airspace is proposed to extend from 500 feet AGL up to 14,000 feet MSL; and

WHEREAS, the existing communication system in the northern MOA's, Special Use Airspace Information Service (SUAIS), is vital for pilots to receive real time information on all military airspace uses and for the military to receive real time information on civilian aeronautical activity.

NOW, THEREFORE, BE IT RESOLVED, that the Matanuska-Susitna Borough Assembly prefers the two EIS alternatives with smaller lateral and vertical footprints; either the "No Action Alternative" that maintains the current Fox 3 MOA or "Alternative E" for the Fox 3 and Paxson MOAs because it moves the proposed southern boundary of "Alternative A" 20 nautical miles to the north.

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BE IT FURTHER RESOLVED, that if Alternative E is the selected alternative, an Overflight Avoidance Area be established twenty (20) nautical miles north of the parallel to the southern boundary of Alternative E, with flight altitude minimums of 5,000 feet AGL.

BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly opposes lowering the minimum flight training altitude to 500 feet for the Fox 3 MOA and the Paxson MOA due to potential impacts on wildlife, civilian aircraft traffic, and recreational uses.

BE IT FURTHER RESOLVED, that the Air Force conduct all supersonic operations in the Fox and Paxson MOAs at or above 5,000 feet AGL or 12,000' MSL, whichever is higher, to reduce sonic boom intensity and its effects on the surface.

BE IT FURTHER RESOLVED, that the Department of Defense delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife areas underlying any new or expanded MOAs consistent with the current restrictions identified in the 1997 Alaska MOA EIS.

BE IT FURTHER RESOLVED, that these restrictions would include, but not be limited to, minimum overflight altitudes over wildlife areas, including waterfowl, raptor and other migratory bird nesting/breeding/concentration areas, Dall sheep lambing areas, caribou and moose critical season habitat areas,

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etc., be reviewed, identified and, if necessary, expanded, with the cooperative assistance of the Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service.

BE IT FURTHER RESOLVED, that spatial and temporal management options (time and area restrictions) be evaluated and established to facilitate the public's use of the area and to ensure the sustainability of the area's natural resources; and

BE IT FURTHER RESOLVED, that there be no Major Flying Exercises (MFE) and overflight of popular subsistence areas, hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, from mid-August through September, and during other important hunting seasons determined by the Alaska Department of Fish and Game.

BE IT FURTHER RESOLVED, that the Department of Defense shall provide detailed maps, aeronautical charts and information to the public, especially in the communities near the Fox 3 and Paxson MOAs, identifying flight corridors, restricted or closure areas, and dates of training use.

BE IT FURTHER RESOLVED, that the Matanuska Susitna Borough Assembly encourages mitigation measures be taken to minimize the impacts on VFR and IFR air traffic in the proposed Fox 3 and Paxson MOAs and urges funds be secured for communication enhancements to SUAIS and expand coverage within the proposed

G0020

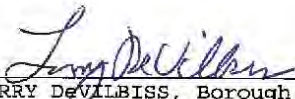
Fox3 and Paxson MOAs prior to the issuance of any airspace.

BE IT FURTHER RESOLVED, should SUAIS not be expanded or become inoperable, the floor of the Fox 3 MOA reverts from 500 feet AGL to 5,000 feet AGL to preserve safety for civil VFR operations.

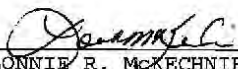
BE IT FURTHER RESOLVED, that the Assembly opposes the establishment of the Paxson MOA between 500 AGL to 14,000 MSL be eliminated due to the importance of the Richardson Highway Corridor.

BE IT FURTHER RESOLVED, that the Assembly opposes any additional Military Operations Areas unless the Federal Aviation Administration and military provide real-time access by IFR aircraft to MOAs to preserve access and safety that are associated with the IFR infrastructure for these parts of Alaska.

ADOPTED by the Matanuska-Susitna Borough Assembly this 28 day of June, 2012.


LARRY DEWITT, Borough Mayor

ATTEST:


LONNIE R. MCKECHNIE, CMC, Borough Clerk (SEAL)

PASSED UNANIMOUSLY: Keogh, Woods, Arvin, Colligan, Salmon,
Colver, and Halter

Page 8 of 8

Resolution Serial No. 12-076
IM No. 12-148

G0021

[REDACTED]

From: Bergerbest, Nathan (Murkowski) [REDACTED]
Sent: Monday, July 09, 2012 2:45 PM
To: ALCOM J08 Admin Box
Cc: GRATION, JULIE A Maj USAFR ALCOM JTF AK/J021; Strain, Steven A Lt Col MIL USAF SAF/FMBL
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: 120709 JPARC DEIS COMMENT.pdf

Here are Senator Murkowski's comments on the JPARC DEIS for official filing.

Nathan Bergerbest
Senior Counsel

[REDACTED]

G0021

LISA MURKOWSKI
ALASKA

COMMITTEES:
ENERGY AND NATURAL RESOURCES
INDUSTRY, BUSINESS AND
CONSUMER PROTECTION
APPROPRIATIONS
HEALTH, EDUCATION, LABOR
AND PENSION
INDIAN AFFAIRS

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July 9, 2012

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SUBMITTED VIA E-MAIL AND US MAIL

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
Joint Base Elmendorf Richardson, AK 99506

COMMENTS ON JPARC DRAFT ENVIRONMENTAL IMPACT STATEMENT

Ladies and Gentlemen:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex Alaska (JPARC). The DEIS presents a comprehensive look at the environmental effects of expanding and modernizing JPARC to address technological advances in military equipment and systems, advances in combat tactics and techniques, a continued need for diversified, efficient and realistic training and the need to maximize scarce resources by maximizing joint training in difficult financial times. I have heard from key stakeholders that the DEIS is a high quality environmental document and the DEIS team is to be commended for their efforts.

As the comment period on the DEIS closes my office has not been given the opportunity to review the comments submitted by stakeholders. Accordingly I will reserve judgment on the various alternatives presented by the DEIS at this time. I do believe, however, that the "No Action" alternative should not be adopted. The world class JPARC is a key attribute of Alaska's value to the military in the 21st Century. No place else in America does the military have the opportunity to conduct state of the art training in diverse terrains without risk of encumbrance.

Alaska has been proud to share its lands and airspace with the military for generations. However, it is important for our military leaders to appreciate that this is an earned privilege rather than a right. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) every effort should be undertaken to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible.

[HOME PAGE AND WEB MAIL](#)
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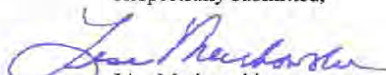
Alaskans stand among the most patriotic people in America and have long been willing to sacrifice personal convenience in order to ensure that our military is the best trained and best equipped fighting force in the world. Alaskans have a long track record of supporting our military families like none other.

For decades the military has proven to be a good partner through its significant year-round contributions to Alaska's economy. In recent months, as the Interior Alaska community has been forced to come to grips with the prospect of a devastating possible downsizing of Eielson Air Force Base, this longstanding trust has been tested.

I fully expect that the people of Alaska will once again rise to support the military's needs in JPARC. However it is also appropriate that the military provide Alaskans with a modicum of certainty that in return our Armed Forces will continue to be good stewards of Alaska's economy.

Over the next few months, as the DEIS team reviews stakeholder comments and formulates a FEIS leading to a Record of Decision the opportunity to rebuild the critical social contract between Alaskans and their Armed Forces presents anew. I sincerely hope that our military leaders take advantage of the upcoming opportunity to expand and modernize JPARC in harmony with Alaska's values and the way of life we hold dear.

Respectfully submitted,



Lisa Murkowski
United States Senator

G0022

[REDACTED]

From: Palach, Brad M (DFG) [REDACTED]
Sent: Monday, July 09, 2012 6:07 PM
To: ALCOM J08 Admin Box
Cc: Fleener, Craig L (DFG); Vincent-Lang, Douglas S (DFG); Mulligan, Ben (DFG); Brookover, Thomas E (DFG)
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: 7-9-2012 ADF&G JPARC Comments.pdf

Please find attached the JPARC comments being submitted on behalf of the Alaska Department of Fish and Game by Deputy Commissioner Craig Fleener. If you need clarification or additional information regarding these comments please contact:

Brad Palach

[REDACTED]

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
Fish and Game**

OFFICE OF THE COMMISSIONER
Central Region Office

333 Raspberry Road
Anchorage, Alaska 99518-1565
Main: 907.267.2156
Fax: 907.267.2419

July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506-2101

Ladies and Gentlemen,

Alaska Department of Fish and Game (Department) reviewed the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). The Department understands and is supportive of the need of the military to conduct training exercises to prepare personnel for defense missions across the globe.

We appreciate the efforts the military has taken to provide information in the development of this planning process. This is especially important since the area under consideration is one of the most accessible and heavily used areas for outdoor activities in the State. However, we are disappointed that federal law and policy restricts the military's training efforts on the many millions of acres of nearby federally administered National Wildlife Refuges, National Parks and BLM lands and instead forces it onto State lands which are highly desired by the general public for outdoor activities. With this in mind, the comments developed below are intended to accommodate the need of the military to use these State public lands while at the same time maintaining public use and access consistent with the desires of the public and the intent of the Constitution of the State of Alaska.

The following are the comments of the Department.

Coordination

We appreciate the intentions of numerous mitigation measures calling for increased communication and coordination with the Department and members of the public, including subsistence and other resource users. To ensure these meetings take place, we recommend this intent be specifically recognized in the Record of Decision and be scheduled to take place on a biannual basis, or as issue specific items emerge so that adaptive management strategies may be more easily developed to address issues as they develop. This action would ensure that the important discourse between the responsible State managers and various user groups and the representatives of the military take place in a timely manner. This is particularly important as uses by the public alter from year to year, resources change in frequency, abundance and location, and as the uses of the military are better understood as the plan is implemented.

Administrative Activities Conducted by the Alaska Department of Fish and Game

We recognize that minimum over flight of 5,000 ft above ground level (AGL) is proposed as mitigation for many areas with identified populations of fish and wildlife, popular hunting and fishing areas, trails, and campgrounds. The sustainability of the fish and wildlife and the popularity of these areas is dependent on plentiful fish and wildlife that is intensively managed by the Department. Through active management, which includes frequent aerial surveys and other flights, we are able to provide opportunities that drive the popularity of these areas with the public, which includes residents of the two largest cities in Alaska, Anchorage and Fairbanks, as well as the Matanuska-Susitna Borough and North Star Borough and other smaller communities near the affected areas. These surveys entail numerous flight hours and flight days, for example, the Department estimates roughly 400 hours of flight time annually in the Proposed Paxson and Fox 3 MOAs for wildlife surveys alone. Without the ability to conduct comprehensive aerial survey work, we will find it exceedingly difficult, if not nearly impossible, to manage populations of fish and wildlife for sustained yield and maintain the current levels of subsistence and other hunting and fishing opportunities.

To accommodate the Department's need for aerial survey work, we recommend the following mitigating measure:

- Throughout the area covered by this planning process, establish a 5,000 ft above ground level (AGL) over annually identified areas as necessary to accommodate the need of Department staff to conduct aerial survey work. Recognize that flexibility and close coordination with the Department will be necessary to accommodate the conduct of this essential work, while respecting the needs of the military for training. (Additional comments provided below will identify some specific dates of use, and locations that staff consider essential for aerial operations or for the conservation of fish, wildlife and habitat, as well as to provide a separation between military operations and the public, both on the ground and in the air.)

The following mitigation measures are intended to identify specific concerns and actions that can be taken to mitigate them. Please be aware that as our knowledge and understanding of the actions of military exercises increases, alterations may be necessary to reduce impacts to fish, wildlife and the public, or to reduce constraints on the military. To support the development of information related the military's use of the area, we request the JPARC planning process consider additional funding for future studies by the Department to help determine if and how military activities affect fish, wildlife, habitat and public uses. Specific localized knowledge of some uses is limited and additional studies may assist in the development of effective mitigation measures, or allow for additional training opportunities. This is consistent with the language in Chapter 4.8.14, Environmental Justice, which notes the need for additional studies regarding cumulative impacts to "airspace management and use, noise, biological resources, cultural resources, land use, socioeconomics, and subsistence."

Of special note, one aspect of these studies should be to consider if closures of airspace or areas are reducing subsistence opportunities or causing disproportionate effects through displacement of users. While the EIS (4.8.14, page 4-36) notes that disproportionate effects due to access restrictions are not expected for subsistence since access to other subsistence resources is available in the vicinity, it does not evaluate the costs in monetary terms or effort that could be involved by having to focus on those alternate resources, or the problems that may be associated with displacement of users into areas where resources may already be fully

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allocated. For subsistence users, including those on low, fixed incomes, minor alterations in expenditures necessary to access alternate resources may be barriers to realistic participation.

Nelchina Caribou Herd and Moose Calving

Because low level flight operations can drive caribou off their calving and post calving areas, leading to increased calf mortality, we request extending the 5,000 ft AGL from May 15 through July 15 throughout the entire Fox3 MOA. This would reduce stress for a significant portion of the period when the Nelchina Caribou Herd are pre and post calving. Without this mitigation, we would have significant concerns for caribou because of their sensitivity to loud human activities, such as low level jet aircraft, at this early life stage. In addition, a 5000 ft AGL floor will allow for safe conduct of the Departments late May parturition surveys and late June/early July population surveys that are essential to management of this important and heavily utilized caribou herd. These surveys also require a great amount of flexibility in survey timing as they are dependent on favorable conditions to cause caribou to aggregate.

A similar situation exists for moose calving. During the moose calving period of May 15 to July 15, a 5,000 ft AGL will be necessary across the entire Fox 3 and the Proposed Paxon MOAs. Unlike caribou, moose do not have concentrated calving areas and spread out to calve, but are also susceptible to intense, low flying aircraft noise. Twinning surveys and calf mortality and survival studies are also conducted during this period from low-level fixed and rotor-wing aircraft. These surveys cannot be safely conducted with a 500 ft AGL floor to the MOAs.

We recommend the following mitigations to reduce stress on caribou and moose calves from low flying military aircraft during an important life stage.

- Establish a 5,000 ft above ground level (AGL) over annually identified pre and post calving areas for moose and caribou from May 15 to July 15 in the Fox3 MOA and the Proposed Paxon MOA

Delta Caribou Herd

We recommend increasing the height and extending the duration of the minimum over flight altitude to reduce stress on Delta Caribou calves during the important pre and post calving period of their lifecycle. The following modification to this mitigation will also allow for our annual count/census and composition surveys necessary to maintain herd sustainability and provide a popular hunting opportunity.

Protect/Conserve the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet AGL over annually identified pre and post calving areas (nominally from May 15 to ~~July~~ June 15).

Talkeetna Dall Sheep

Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations from May 15 to July 15 in the following areas:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),

- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

Delta Bison

Proposed actions in the Donnelly Training Area Battle Area Complex Restricted Area (BAX RA) could have an impact on Delta bison movements and behavior, and cause bison to move toward the Delta Agricultural Project area earlier in the year, or discourage them from moving through the BAX RA during migration back to the Delta River in the spring. We recommend that the existing restrictions on disturbance to bison habitat areas under the U.S. Army Garrison Fort Wainwright, Alaska Special Interest Management Area be maintained.

Moose Hunting, Fox 2 and Eielson MOAs: The principal use in the identified ground evacuation areas within Eielson and Fox 2 MOA's is moose hunting, conducted during two general periods of the year – fall and winter. The fall period extends from August 15 to September 25, with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time frames, early winter (November 15 to December 15), and late winter (January 15 to February 28), and are generally conducted on weekend days when weather conditions permit. The time period between December 15 and January 15 is generally avoided by hunters due to seasonally low temperatures. Hunting access in the fall is generally conducted through ORV trails, rivers, and airstrips and tends to be concentrated near or along these access points. Access in the winter is more dispersed due to snowmobile use. Of the areas affected by the "Definitive Actions", the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.

As a mitigating measure, we recommend that low level flights (below 5000 AGL) and ground based use not occur in the Fox 2 or Eielson MOAs during scheduled hunting seasons. Additionally, we request that low level flights not occur during the May 15 to July 15 pre and post calving period for caribou, moose and Dall sheep.

Wildlife Mortalities

Throughout the training areas, we request that all known wildlife mortalities caused by military activities be reported within 72 hours to the Department's Area Wildlife Staff.

Habitat Enhancement and Stream Crossings

If it is determined by the military that, stream crossings, habitat enhancement or alteration in any of the MOAs is a desired mitigation, we request consultation with the responsible Area Wildlife and Habitat Biologists to avoid unintended consequences and to obtain necessary permits. Recommended contacts are the Regional Supervisor's for the Division of Habitat, and Division of Wildlife Conservation based in the Departments Fairbanks area office.

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Bears

Human generated waste products, primarily discarded or improperly stored food, from 1000 troops during field maneuvers could pose a wildlife attractant, particularly to bears. We previously noted that the DEIS did not address management actions to prevent wildlife from becoming habituated to human generated food and its associated negative impacts. A review of the draft document shows that there remains the need for the development of a comprehensive program to educate military personnel on how to manage human waste that may attract bears that could cause them to become habituated to human waste.

New Public Overflight Restriction Area

We appreciate the development of Alternative A. This Alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves a popular area for hunting open for the public and for the Department's use on a regular basis. This area is one of the highest utilized hunting areas in GMU 20A (Figure 3-11, Page 3-58). Closing this area through the expansion of restricted areas R-2211 and R-2202 would have created a significant access hardship for the public and the Department.

Harvest of Wildlife for Subsistence and other uses

The discussion in Chapter 3.1.13.1 Impact Assessment Methodology contains confused and incorrect definitions of public lands and Conservation System Units (CSUs), as well as erroneous descriptions and ratings of community dependence on subsistence based on racial criteria.

Federal Public lands are defined in Section 102(3) of ANILCA as "...land situated in Alaska which, after the date of enactment of this Act, are federal lands...". Conservation system units (CSUs) are defined in ANILCA at 102(4) as "...any unit in Alaska of the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument..." Because of the legal application of subsistence to federal public lands it is important to properly define these legal terms.

The discussion related to the dependence of subsistence by communities and their ratings is also flawed by the inclusion of the criteria "...whether the communities are predominately Alaska Native." Neither the Alaska Constitution or federal law regarding subsistence in Alaska differentiates subsistence use along racial lines, unless specifically permitted by Congress (re: Marine Mammal Protection Act, Endangered Species Act, etc.). While it is recognized that the Alaskan Native community has a long history of subsistence use, we request that the EIS revise this section to properly include existing State and Federal law regarding subsistence use and participation.

It should also be noted that through interpretation of the Alaska Constitution, under state law, all Alaska residents are considered eligible to conduct subsistence activities where that activity is allowed. The discussion as presented in the referenced section should be recognized as having no bearing on the allocation of fish and wildlife, which is under the purview of the Alaska Boards of Fisheries and Game, and the Federal Subsistence Board.

Also related to subsistence and other uses,

We appreciate the proposed mitigation to not conduct major flying exercises (MFEs) during the fall hunting season; however, the proposed September prohibition does not encompass all of the most important use periods, when over 5000 hunters and their households rely on this area for subsistence harvest of moose and caribou. Big game hunting in the area for subsistence and general uses begins with the August 10 opening for caribou and reaches a peak during the September 11 to September 20 period. Hunters are also in the field throughout the Proposed Paxson MOA and the Fox 3 MOA during the winter season – most heavily between October 21 and the end of November, after which use is reduced as caribou migrate from the area and winter weather sets in. The Proposed Paxson MOA and the Fox 3 MOA also constitute the most popular and highly used areas in the state for small game hunting. This hunting occurs year-around with peak activity in August-October and February-March. To encompass these periods, we recommend the following mitigation:

- Conduct no MFEs from August 10 to September 30 and October 21 to November 31 in the Fox 3 MOA and the proposed Paxson MOA, and minimize MFEs during the February-March period to avoid disturbance or displacement of small game hunters.

Safety

The mitigation, *"Notify Alaska press outlets of the annual MFE schedule for release in publications such as the Milepost, visitor and travel guides, and various newspapers"* will help keep the public informed. We recommend development of a specific website devoted to this information, as well as publishing in local outlets such as the Valley Frontiersmen and Delta News (web and hard copy) in addition to the Fairbanks News Miner and Anchorage Daily News, and physically posting notices at public and impromptu access points along the road system. In addition, the DEIS should recognize that hunters, trappers, fisherman, landowners, miners, agency personnel, and other users employ float, ski, and tundra tire equipped aircraft and light helicopters to access these popular and high-use areas. Private airfields (See Appendix D) do not capture the vast number of "off-field" areas used for access with this equipment. Avoidance by military aircraft, as well as SUAIS radio-coverage, must be implemented with recognition of these uses if public safety is to be maintained.

We also recommend that the training schedules with associated area or airspace restrictions be published as early as possible in the calendar year to allow residents, subsistence and recreation visitors to the area to coordinate plans for use of the area. Many hunting and other outdoor use plans are made many months in advance so that this type of information would be useful to visitors and reduce conflicts.

Watana – Susitna hydroelectric Project

The DEIS fails to recognize the Watana-Susitna Hydroelectric Project in the Fox 3 MOA. This major effort includes numerous engineering, wildlife, fisheries and habitat studies that all use small aircraft for access, surveys, aerial radio-telemetry, and mapping that will greatly increase VFR traffic for many years. For example, wildlife studies alone will approximately double the flight hours in the Fox 3 MOA to over 800 hours per year. The study areas for this project compose up to 500 square miles in the existing Fox 3 MOA. While a 5000 ft AGL floor poses little safety concerns, the high level of traffic associated with this project creates serious potential airspace conflicts

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at the lower 500ft AGL floor. Close coordination with the Alaska Energy Authority and associated agencies and contractors will be crucial to maintaining safety.

Civilian Airspace Management

We recommend meetings be scheduled on an annual or biannual basis and include ADFG staff participation. A commitment in the Record of Decision to conduct these meetings on a regularly scheduled basis would assist in ensuring that public input and the development of adaptive management is employed in this high public use area.

Coordinate with the FAA, ADFG, and local civilian aviation interests/stakeholders through the ACMAC, the U.S. Army Alaska Aviation Safety Standard Council, and other such forums to discuss and resolve issues of mutual interest affecting military and civilian airspace uses for existing and new SUA and restricted airspace on an annual or biannual basis.

Major Fighting Exercises (MFEs)

We recognize that expanded MFEs are integral to training needs in the JPARC; however, the September, December, January prohibition against MFEs will not adequately mitigate their affect on caribou and moose calving areas, sheep lambing and rutting areas, and popular hunting seasons. We recommend the following mitigation:

Conduct no MFEs during May 15 to July 15, August 10 to September 30, October 21 to November 31, and December, and January.

Spelling

We recommend a word search be performed to address spelling issues throughout the plan. For example Goodness River should be Goodnews River, and Paxon MOA should be Paxson MOA.

Page Specific Comments

Page 3-71. Hunting. Add ptarmigan to the primary species hunted in the area and revise the document to show that Dall sheep and goat seasons are not short, with the sheep season 40 days long and encompassing other high use seasons. There are no goat seasons within the proposed MOAs (there are few goats within the area).

Page 3-82: line 4. The vast majority of fish and wildlife surveys in the Proposed MOAs are conducted by the Department and not the land management agencies. The statement on line 6 regarding survey timing ("Mostly these occur in late summer/early fall and before the first snow") is incorrect. The routine survey schedule is as follows (surveys marked with asterisks are essential surveys that are conducted every year):

May 15 – June 10: Caribou parturition surveys*; moose twinning*, calf survival and periodic mortality surveys; occasional bear surveys.

June 20 – July 10: Caribou population estimate* and composition surveys*

Mid summer; Dall sheep surveys*

October 1-10: Caribou composition survey*

Following first adequate snow cover (~mid-October) and before Dec. 7: Moose population estimates*

May 5-June 5: Ptarmigan surveys (aircraft access)

Late March-Early April: Watana Su-Hydro winter range moose surveys* (scheduled for the next several years).

Monitoring of moose and caribou movements via aerial radio-telemetry: Year-around.

Page 3-82: Line 14. We appreciate that the DEIS recognizes the significant impacts of reduced access on livelihoods. It is important to also recognize that most of the Departments wildlife surveys are charter flights flown by small air taxi operators from around the region. Most of these operators also generate revenue from the transport of hunters, fishermen and other recreationists. A reduction in this economic activity could result in reduced availability of local air taxi operators for fish and wildlife surveys and monitoring, hindering the Departments ability to successfully manage fish and wildlife.

Page 3-82: Lines 22-24: It is misleading to state that avoidance of 1 or 3 NM allows access to private and public airports, respectively. Consider that, to avoid military training activities, aircraft will have to operated below 500' AGL enroute to the airport avoidance area. Many pilots will choose to avoid prolonged operation at below 500 ft AGL for safety purposes. Furthermore, mountainous terrain and windy conditions may further preclude safe flight at those low altitudes. These airports, as well as numerous "off-field" landing areas are critical for wildlife survey and animal capture activities. Also consider that "planning around military schedules" will likely have economic effects on aviation related business through reduction in overall activity and the generation of fees.

Page 3-84: Alternative E: Most of the comments above also apply to all action alternatives.

Page 3-97: Line 38. Harvesting subsistence resources is not a certain event. Thus a delays result in lost opportunity.

Page 3-97: Line 41. The stated intent of allowing for administrative survey flights to be conducted with minimal disruption is appreciated. Because of its importance and to ensure that it will be implemented in an agreed to manner, we request that date-specific mitigation efforts and agreements be specifically noted in the ROD for ease of reference.

Page 3-97: Line 43: See comments above for page 3-82, lines 22-24 above

Page 3-99 (Section 3.2.13.4 and elsewhere) Mitigations:

- No MFEs August 10 – September 30 and October 21 – November 30.
- No training activities below 5000 ft AGL to allow for essential wildlife surveys during the following periods:
 - May 15 – June 10
 - June 20 – July 10

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- o October 1-10
- o After first adequate snow cover (~mid-October) and before Dec. 7 (this request will vary from year to year depending on snowfall and can take 5 to 10 days to complete depending on weather conditions. This effort can be coordinated on a seasonal basis.

To improve coordination between the military and local subsistence users, we request the final document commit to scheduling annual or biannual meetings in effected communities to determine and seek solutions to identified issues related to the subsistence use of the area. We request the following changes to this mitigation measure.

The preceding analysis of effects on this resource has identified potential adverse impacts. The following preliminary mitigation is under consideration as possible ways to reduce these impacts.

All alternatives:

Expand consultation efforts with subsistence parties in the affected area on an annual or biannual basis to determine current subsistence use levels and areas on USAG-FWA lands as input into scheduling. Expand tribal consultation efforts with subsistence users about hunting and fishing programs on USAG FWA land. Continue to use a newsletter to provide information to subsistence users about existing and new military activities and the changes in access for subsistence users. Expand research and cooperative studies with Tribes to address possible effects of Air Force and Army activities on subsistence resources both directly within USAG-FWA installation boundaries and those outlying resources that may also be affected by military activities on DTA West, DTA East, YTA, and TFTA.

Appendix I

Page I-2. It appears that several plans in this appendix are outside the area of the plan and we question their inclusion in this plan. For example: Draft Revised Special Use Land Designation for the Togiak National Wildlife Refuge and Lower Goodnews River State DNR Hatcher Pass Planning, Chugach State Park, Nancy Lake State Recreational Area, BLM Bay Proposed Resource Management Plan and Final EIS.

Page I-43. The June 27 to July 11 flight avoidance area along the Delta River is inadequate to conserve Dall sheep lambing and rutting habitat. We recommend the flight avoidance period include May 15 to July 15 for lambing areas, and from November 15 to December 15 over rutting areas. We request annual contact with the Department to ensure these locations have not shifted or need adjustment.

Page I-48. We question the need to include game management units outside the area of the plan. These include GMU 9, 16, 17, and 19.

Appendix G

Page G-2, No. 9, Caribou - Overflights. Fox1 MOA, Fox2 MOA, and Proposed Paxson MOA should be included in this mitigation. We recommend increasing altitude and extending the minimum duration of the period to conserve the Delta Caribou calves during an important period of their life cycle and ensure their sustainability. The following modification to this mitigation measure will also allow for annual count/census and composition surveys necessary for us to continue to provide a popular hunting opportunity.

~~Protecting~~ Conserving the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet above ground level (AGL), over calving and post calving areas, in appropriate areas of the Fox1, Fox2, proposed Paxson, Birch, and Eielson MOAs from May 15 to July 15. Annually contact ADF&G to determine specific areas of avoidance.

Page G-2, No. 10 Dall Sheep - Overflights. We recommend adding the proposed Paxson MOA to the list of areas establishing a minimum overflight altitude. This is needed to conserve Dall sheep in the mountainous region north of the Black Rapids. Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations. In particular:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),
- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

To encompass these concerns, we recommend the following mitigation measure be implemented:

~~Protect~~ Conserve Dall sheep by establishing a minimum overflight altitude of 5,000 feet AGL over lambing areas and spring mineral licks, in appropriate areas of Yukon 1, 2, 3, and 4, Buffalo, Eielson, Paxson, and Fox MOAs (nominally May 15 to July 15), and over rutting areas (nominally from November 15 to December 15). These areas will be identified during annual consultation with ADF&G prior to the May 15 and November 15 dates stated above.

Page G-3, No. 22 Aircraft, Habitat Protection. The document provides a good discussion of this important mitigation measure to protect important wildlife habitat in JPARC; however, to provide a more comprehensive list we request an annual meeting to update it. For example, we recommend adding the Oshetna River caribou calving grounds, Watana Creek caribou calving grounds, and the Eastern Talkeetna Mountains for Dall sheep populations. In particular, the mountains north and east of Chickaloon River, the mountain block between the Upper Talkeetna River northeast to Mt. Watana (west of Lower Kosina Creek), and the mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana, and east over to Jay/Coal Creek. We request the following change to this mitigation.

Avoiding the creation of aircraft noise around the Gulkana and Delta National Wild and Scenic Rivers, Tangle Lakes area, Richardson Highway, and trumpeter swan nesting areas within the Fox MOA eastern boundary. These areas will be updated during annual consultation with ADF&G prior to May 15.

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Appendix K, Mitigation Measures

Page K-11, Biological, 4th Proposed Mitigation. This mitigation measure should also apply to Fox3 MOA and the Proposed Paxson MOA. We also request a start date for this study.

Expand effort to conduct a detailed study to assess the impacts and effects of noise on wildlife, particularly key species, such as caribou and bison during critical life cycle seasons. Use information to include protection requirements within a noise management plan.

Page K-19, Land Use-Recreation. GMU 13 is an important moose and caribou hunting area, likely the most heavily used area in the state due to accessibility of the area to residents from Anchorage, the Matanuska Susitna Borough, and Fairbanks. In 2010, 5,015 individual moose hunters reported hunting in GMU 13, a number that has been steadily increasing since 2002. This increase is partially credited to the current active management programs which the state has invested significant time and energy to increase moose abundance for the benefit of consumptive users. Current objectives for moose are being achieved, with some additional increases planned. The overall management objective is to maintain a high level of harvestable moose with sufficient hunter participation annually to avoid habitat impacts. Caribou hunting is also highly popular with 4,887 hunters reporting hunting this area in 2010, with a peak participation of 19,397 hunters in 1996. As shown by the above discussion, GMU 13 is an important moose and caribou hunting area.

Currently, the EIS only lists Crosswind Lake and the Matanuska Valley Moose Range as hunting areas to avoid. However, the additional areas listed below support intense hunting for moose and caribou on a seasonal basis and should be added to the list. To accommodate this continued and important use, we request the following modifications to the first proposed mitigation measure shown on page K-19

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid- August 10~~ through September 20, ~~and October 21 to November 30,~~ and other important hunting seasons determined in annual consultation with ADFG. Locations to avoid include:

- *Crosswind Lake, ~~and~~*
- *Matanuska Valley Moose Range,*
- *Denali Highway between Cantwell and Paxson,*
- *Richardson Highway between Gulkana and Black Rapids,*
- *Tak Cutoff (Glenn Highway) between Gakona and Mentasta,*
- *The Gakona/Chistochina River drainages,*
- *Upper Susitna River drainage (above Tyone R),*
- *Brushkana River drainage,*
- *Coal Creek drainage,*
- *Watana Creek drainage,*
- *Upper Nenana River/Wells Creek area,*
- *Lake Louise/Susitna/Tyone Lake system,*
- *Maclaren River drainage,*
- *Tangle Lake system,*
- *Hungry Hollow/Paxson/Summit/Fielding Lake areas,*

- Swede Lake drainage in Hungry Hollow down to the Alphabet Hills (bordered on the south by the W Fork Gulkana River).
- Gillespie/June/Nita/Dick Lakes along the Richardson Highway south of Paxson.
- Nelchina Public Use Area from the Glenn Highway near Eureka north to the Susitna River.

Page K-21, Land Use – Recreation. The list of areas to avoid currently appears to consist primarily of BLM campgrounds. However, many additional popular trails for hunting and other recreating in the area exist and merit inclusion. Several trails exist up and down the MacLaren River, including the MacLaren Summit Trail to the north, and trails on both sides going generally north, and a trail on the west side going south. Another trail system extends through the Glacier Lake/Sevenmile Lake/MacLaren River, with an additional trail up the West Fork MacLaren River for XX miles. Other known popular trails include:

- Swede Lake Trail,
- Middle Fork Trail (heads west of Meier's Lake),
- Round Top trail which heads east of the Richardson Highway towards Round Top Mtn,
- Haggard Creek Trail,
- Ewan Lake Trails (one from the east and one from the south of the lake),
- Lake Louise/Crosswind Trail,
- Tolsona Lake/Crosswind Trail,
- Butte Lake Trail,
- Coal Creek trail (starts east of Butte Lake),
- Moore's Camp Trail (starts at Mile 51 on Denali Highway goes south over the mountain and down to a MacLaren River crossing),
- Top of the World Trail near Paxson/Black Rapids,
- Chistochina River Trail,
- Mankomen Lake Trail,
- Indian River Trail,
- Slana River Trail.
- There is a huge network of trails all through the Nelchina Public Use Area, dozens, starting with the Eureka/Little Nelchina Trails, north to the Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake, and east over to the Moore Lake/Grayling Lake/Marie Lake areas west of Lake Louise/Susitna.

To accommodate the use of additional popular trails in the area, we request the following modifications to the fifth proposed mitigation measure shown on page K-21.

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid- August 10 through September 20, and October 21 to November 30,~~ and other important hunting seasons determined annually with ADFG. Locations to avoid include:

- *Brushkana Creek campground,*
- *Tangle Lakes campground,*
- *Paxson Lake campground,*

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- *Clearwater Wayside,*
- *One Mile Creek/Wolverine Mountain,*
- *Tangle Lakes trail,*
- *Gulkana River Raft trail,*
- *Costner Glacier trail,*
- *Sourdough campground,*
- *Lake Louise State Recreation Area,*
- *MacLaren Summit Trail,*
- *Glacier Lake/Sevenmile Lake/MacLaren River Trail System,*
- *West Fork MacLaren River Trail,*
- *Swede Lake trail,*
- *Middle Fork Trail,*
- *Round Top Trail,*
- *Haggard Creek Trail,*
- *Ewan Lake Trails,*
- *Lake Louise/Crosswind Trail,*
- *Tolsona Lake/Crosswind Trail,*
- *Butte Lake Trail,*
- *Coal Creek trail,*
- *Moore's Camp Trail,*
- *Top of the World Trail,*
- *Chistochina River Trail,*
- *Mankomen Lake Trail,*
- *Indian River Trail,*
- *Slana River Trail,*
- *Nelchina Public Use Area Trail System,*
- *Eureka/Little Nelchina Trails,*
- *Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail,*
- *Moore Lake/Grayling Lake/Marie Lake Trail,*

Page K-24, Subsistence. The period prohibiting MFEs should encompass the period from 10 August – 30 September and 21 October – 31 November, instead of 20 August – September 20. This change will protect the most important subsistence hunting seasons for caribou and moose. We request the following modification,

No MFEs conducted during 10 August – 30 September and 21 October – 31 November ~~20 August – 20 September~~ in Fox 3 and expansion areas and new Paxon MOA. This restriction does not apply to US Army training or testing.

Page K-24, Subsistence. Biannual coordination meetings with the Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.

Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas underlying new MOAs consistent with current restrictions identified in the 1997 Alaska MOA EIS. These restrictions would include minimum overflight altitudes over Dall sheep lambing

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areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.

Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.

Modify existing Letter of Agreement with ADFG to avoid overflight of caribou and moose calving areas, and sheep lambing, mineral licks and rutting areas in Fox 3 expansion areas and new Paxon MOA.

Page K-25, Subsistence. We support these approaches, but request that the final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.

Conduct annual or biannual meetings with regulating agencies and with communities dependent on subsistence resources under new airspace with a view to monitor impacts of Air Force activities on subsistence. Information would be used to adjust flight avoidance locations, or to add new ones.

Update the current SUAIS to include information on MOA activation and provide advanced notice of MFEs to communities and management agencies that use and access lands underlying the Fox 3 MOA, the Fox 3 expansion areas, and the new Paxon MOA.

Sincerely,


Craig L. Fleener
Deputy Commissioner

G0022

[REDACTED]

[REDACTED]

[REDACTED]

-----Original Message-----

From: Palach, Brad M (DFG) [REDACTED]
Sent: Tuesday, July 24, 2012 3:45 PM
To: ALCOM J08 Admin Box
Cc: Fleener, Craig L (DFG); Cheney, Jason L (DFG)
Subject: FW: Joint Pacific Alaska Range Complex EIS Comment Submission

On July 9, 2012, the Alaska Department of Fish and Game submitted comments on the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) (see attached). In reviewing the comments we submitted, it was found that the comment submitted on page 5, regarding the New Public Over-flight Restriction Area (R-2202 and R-2211), had important information that was unintentionally omitted. At this time I am requesting that you accept the revised, corrected comment provided in the attached document entitled "12-7-24 ADFG Amended Comment" to replace the previously submitted comment regarding this specific subject. All other comments remain as previously submitted.

If you need additional information, please contact me.

Thank you
Brad Palach

G0022

Alaska Department of Fish and Game

(907) 267-2145

From: Palach, Brad M (DFG)
Sent: Monday, July 09, 2012 3:07 PM
To: 'alcom.j08@elmendorf.af.mil'
Cc: Fleener, Craig L (DFG); Vincent-Lang, Douglas S (DFG); Mulligan, Ben (DFG); Brookover, Thomas E (DFG)
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission

Please find attached the JPARC comments being submitted on behalf of the Alaska Department of Fish and Game by Deputy Commissioner Craig Fleener. If you need clarification or additional information regarding these comments please contact:

Brad Palach

333 Raspberry Rd

Anchorage, AK 99516

Alaska Department of Fish and Game

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G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
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ANILCA PROGRAM

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July 24, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
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Ladies and Gentlemen

On July 9, 2012, the Alaska Department of Fish and Game submitted comments on the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). In reviewing the comments submitted, we determined that the comment on page 5, regarding the New Public Overflight Restriction Area (R-2202 and R-2211), had important information that was unintentionally omitted. At this time I am requesting that you accept the revised, corrected comment provided below in place of the previously submitted comment.

New Public Overflight Restriction Area

Both alternatives A and B considerably expand R-2202 and/or R-2211 into areas of private and public land that receives high public use and is heavily used by the Departments for administrative activities for management and research purposes. The solution is to consider the most recent alternative written into the EIS, called the "North-South Run-In Headings for Inert Ordnance Delivery." This alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves that area open for public and Department use on a regular basis. Closing the area between R-2211 and R-2202 would create a significant access hardship for the public and the Department.

To effectively resolve this concern, we request that a new alternative be developed for live ordnance that is similar to the new inert ordnance alternative. It appears that the proposed live ordnance target could be relocated so that the drop area and ground exclusion area would be located entirely within the Donnelly Training Area. This would limit air restrictions and ground exclusion areas exclusively to the Donnelly Training Area, does not expand live ordnance restricted areas R-2202 or R-2211, and would reduce the impact to the public and the Department.

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July 24, 2012

I apologize for this inconvenience and ask that you direct any questions concerning this issue to me.

Thank you for your attention to this matter.

Sincerely,

Brad Palach
Natural Resource Manager III

cc: Craig Fleener, Deputy Commissioner, ADF&G

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
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July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
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Ladies and Gentlemen,

Alaska Department of Fish and Game (Department) reviewed the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). The Department understands and is supportive of the need of the military to conduct training exercises to prepare personnel for defense missions across the globe.

We appreciate the efforts the military has taken to provide information in the development of this planning process. This is especially important since the area under consideration is one of the most accessible and heavily used areas for outdoor activities in the State. However, we are disappointed that federal law and policy restricts the military's training efforts on the many millions of acres of nearby federally administered National Wildlife Refuges, National Parks and BLM lands and instead forces it onto State lands which are highly desired by the general public for outdoor activities. With this in mind, the comments developed below are intended to accommodate the need of the military to use these State public lands while at the same time maintaining public use and access consistent with the desires of the public and the intent of the Constitution of the State of Alaska.

The following are the comments of the Department.

Coordination

We appreciate the intentions of numerous mitigation measures calling for increased communication and coordination with the Department and members of the public, including subsistence and other resource users. To ensure these meetings take place, we recommend this intent be specifically recognized in the Record of Decision and be scheduled to take place on a biannual basis, or as issue specific items emerge so that adaptive management strategies may be more easily developed to address issues as they develop. This action would ensure that the important discourse between the responsible State managers and various user groups and the representatives of the military take place in a timely manner. This is particularly important as uses by the public alter from year to year, resources change in frequency, abundance and location, and as the uses of the military are better understood as the plan is implemented.

Administrative Activities Conducted by the Alaska Department of Fish and Game

We recognize that minimum over flight of 5,000 ft above ground level (AGL) is proposed as mitigation for many areas with identified populations of fish and wildlife, popular hunting and fishing areas, trails, and campgrounds. The sustainability of the fish and wildlife and the popularity of these areas is dependent on plentiful fish and wildlife that is intensively managed by the Department. Through active management, which includes frequent aerial surveys and other flights, we are able to provide opportunities that drive the popularity of these areas with the public, which includes residents of the two largest cities in Alaska, Anchorage and Fairbanks, as well as the Matanuska-Susitna Borough and North Star Borough and other smaller communities near the affected areas. These surveys entail numerous flight hours and flight days, for example, the Department estimates roughly 400 hours of flight time annually in the Proposed Paxson and Fox 3 MOAs for wildlife surveys alone. Without the ability to conduct comprehensive aerial survey work, we will find it exceedingly difficult, if not nearly impossible, to manage populations of fish and wildlife for sustained yield and maintain the current levels of subsistence and other hunting and fishing opportunities.

To accommodate the Department's need for aerial survey work, we recommend the following mitigating measure:

- Throughout the area covered by this planning process, establish a 5,000 ft above ground level (AGL) over annually identified areas as necessary to accommodate the need of Department staff to conduct aerial survey work. Recognize that flexibility and close coordination with the Department will be necessary to accommodate the conduct of this essential work, while respecting the needs of the military for training. (Additional comments provided below will identify some specific dates of use, and locations that staff consider essential for aerial operations or for the conservation of fish, wildlife and habitat, as well as to provide a separation between military operations and the public, both on the ground and in the air.)

The following mitigation measures are intended to identify specific concerns and actions that can be taken to mitigate them. Please be aware that as our knowledge and understanding of the actions of military exercises increases, alterations may be necessary to reduce impacts to fish, wildlife and the public, or to reduce constraints on the military. To support the development of information related the military's use of the area, we request the JPARC planning process consider additional funding for future studies by the Department to help determine if and how military activities affect fish, wildlife, habitat and public uses. Specific localized knowledge of some uses is limited and additional studies may assist in the development of effective mitigation measures, or allow for additional training opportunities. This is consistent with the language in Chapter 4.8.14, Environmental Justice, which notes the need for additional studies regarding cumulative impacts to "airspace management and use, noise, biological resources, cultural resources, land use, socioeconomics, and subsistence."

Of special note, one aspect of these studies should be to consider if closures of airspace or areas are reducing subsistence opportunities or causing disproportionate effects through displacement of users. While the EIS (4.8.14, page 4-36) notes that disproportionate effects due to access restrictions are not expected for subsistence since access to other subsistence resources is available in the vicinity, it does not evaluate the costs in monetary terms or effort that could be involved by having to focus on those alternate resources, or the problems that may be associated with displacement of users into areas where resources may already be fully

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allocated. For subsistence users, including those on low, fixed incomes, minor alterations in expenditures necessary to access alternate resources may be barriers to realistic participation.

Nelchina Caribou Herd and Moose Calving

Because low level flight operations can drive caribou off their calving and post calving areas, leading to increased calf mortality, we request extending the 5,000 ft AGL from May 15 through July 15 throughout the entire Fox3 MOA. This would reduce stress for a significant portion of the period when the Nelchina Caribou Herd are pre and post calving. Without this mitigation, we would have significant concerns for caribou because of their sensitivity to loud human activities, such as low level jet aircraft, at this early life stage. In addition, a 5000 ft AGL floor will allow for safe conduct of the Departments late May parturition surveys and late June/early July population surveys that are essential to management of this important and heavily utilized caribou herd. These surveys also require a great amount of flexibility in survey timing as they are dependent on favorable conditions to cause caribou to aggregate.

A similar situation exists for moose calving. During the moose calving period of May 15 to July 15, a 5,000 ft AGL will be necessary across the entire Fox 3 and the Proposed Paxon MOAs. Unlike caribou, moose do not have concentrated calving areas and spread out to calve, but are also susceptible to intense, low flying aircraft noise. Twinning surveys and calf mortality and survival studies are also conducted during this period from low-level fixed and rotor-wing aircraft. These surveys cannot be safely conducted with a 500 ft AGL floor to the MOAs.

We recommend the following mitigations to reduce stress on caribou and moose calves from low flying military aircraft during an important life stage.

- Establish a 5,000 ft above ground level (AGL) over annually identified pre and post calving areas for moose and caribou from May 15 to July 15 in the Fox3 MOA and the Proposed Paxon MOA

Delta Caribou Herd

We recommend increasing the height and extending the duration of the minimum over flight altitude to reduce stress on Delta Caribou calves during the important pre and post calving period of their lifecycle. The following modification to this mitigation will also allow for our annual count/census and composition surveys necessary to maintain herd sustainability and provide a popular hunting opportunity.

Protect/Conserve the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet AGL over annually identified pre and post calving areas (nominally from May 15 to ~~July~~ June 15).

Talkeetna Dall Sheep

Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations from May 15 to July 15 in the following areas:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),

- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

Delta Bison

Proposed actions in the Donnelly Training Area Battle Area Complex Restricted Area (BAX RA) could have an impact on Delta bison movements and behavior, and cause bison to move toward the Delta Agricultural Project area earlier in the year, or discourage them from moving through the BAX RA during migration back to the Delta River in the spring. We recommend that the existing restrictions on disturbance to bison habitat areas under the U.S. Army Garrison Fort Wainwright, Alaska Special Interest Management Area be maintained.

Moose Hunting, Fox 2 and Eielson MOAs: The principal use in the identified ground evacuation areas within Eielson and Fox 2 MOA's is moose hunting, conducted during two general periods of the year – fall and winter. The fall period extends from August 15 to September 25, with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time frames, early winter (November 15 to December 15), and late winter (January 15 to February 28), and are generally conducted on weekend days when weather conditions permit. The time period between December 15 and January 15 is generally avoided by hunters due to seasonally low temperatures. Hunting access in the fall is generally conducted through ORV trails, rivers, and airstrips and tends to be concentrated near or along these access points. Access in the winter is more dispersed due to snowmobile use. Of the areas affected by the "Definitive Actions", the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.

As a mitigating measure, we recommend that low level flights (below 5000 AGL) and ground based use not occur in the Fox 2 or Eielson MOAs during scheduled hunting seasons. Additionally, we request that low level flights not occur during the May 15 to July 15 pre and post calving period for caribou, moose and Dall sheep.

Wildlife Mortalities

Throughout the training areas, we request that all known wildlife mortalities caused by military activities be reported within 72 hours to the Department's Area Wildlife Staff.

Habitat Enhancement and Stream Crossings

If it is determined by the military that, stream crossings, habitat enhancement or alteration in any of the MOAs is a desired mitigation, we request consultation with the responsible Area Wildlife and Habitat Biologists to avoid unintended consequences and to obtain necessary permits. Recommended contacts are the Regional Supervisor's for the Division of Habitat, and Division of Wildlife Conservation based in the Departments Fairbanks area office.

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Bears

Human generated waste products, primarily discarded or improperly stored food, from 1000 troops during field maneuvers could pose a wildlife attractant, particularly to bears. We previously noted that the DEIS did not address management actions to prevent wildlife from becoming habituated to human generated food and its associated negative impacts. A review of the draft document shows that there remains the need for the development of a comprehensive program to educate military personnel on how to manage human waste that may attract bears that could cause them to become habituated to human waste.

New Public Overflight Restriction Area

We appreciate the development of Alternative A. This Alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves a popular area for hunting open for the public and for the Department's use on a regular basis. This area is one of the highest utilized hunting areas in GMU 20A (Figure 3-11, Page 3-58). Closing this area through the expansion of restricted areas R-2211 and R-2202 would have created a significant access hardship for the public and the Department.

Harvest of Wildlife for Subsistence and other uses

The discussion in Chapter 3.1.13.1 Impact Assessment Methodology contains confused and incorrect definitions of public lands and Conservation System Units (CSUs), as well as erroneous descriptions and ratings of community dependence on subsistence based on racial criteria.

Federal Public lands are defined in Section 102(3) of ANILCA as "...land situated in Alaska which, after the date of enactment of this Act, are federal lands...". Conservation system units (CSUs) are defined in ANILCA at 102(4) as "...any unit in Alaska of the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument..." Because of the legal application of subsistence to federal public lands it is important to properly define these legal terms.

The discussion related to the dependence of subsistence by communities and their ratings is also flawed by the inclusion of the criteria "...whether the communities are predominately Alaska Native." Neither the Alaska Constitution or federal law regarding subsistence in Alaska differentiates subsistence use along racial lines, unless specifically permitted by Congress (re: Marine Mammal Protection Act, Endangered Species Act, etc.). While it is recognized that the Alaskan Native community has a long history of subsistence use, we request that the EIS revise this section to properly include existing State and Federal law regarding subsistence use and participation.

It should also be noted that through interpretation of the Alaska Constitution, under state law, all Alaska residents are considered eligible to conduct subsistence activities where that activity is allowed. The discussion as presented in the referenced section should be recognized as having no bearing on the allocation of fish and wildlife, which is under the purview of the Alaska Boards of Fisheries and Game, and the Federal Subsistence Board.

Also related to subsistence and other uses,

We appreciate the proposed mitigation to not conduct major flying exercises (MFEs) during the fall hunting season; however, the proposed September prohibition does not encompass all of the most important use periods, when over 5000 hunters and their households rely on this area for subsistence harvest of moose and caribou. Big game hunting in the area for subsistence and general uses begins with the August 10 opening for caribou and reaches a peak during the September 11 to September 20 period. Hunters are also in the field throughout the Proposed Paxson MOA and the Fox 3 MOA during the winter season – most heavily between October 21 and the end of November, after which use is reduced as caribou migrate from the area and winter weather sets in. The Proposed Paxson MOA and the Fox 3 MOA also constitute the most popular and highly used areas in the state for small game hunting. This hunting occurs year-around with peak activity in August-October and February-March. To encompass these periods, we recommend the following mitigation:

- Conduct no MFEs from August 10 to September 30 and October 21 to November 31 in the Fox 3 MOA and the proposed Paxson MOA, and minimize MFEs during the February-March period to avoid disturbance or displacement of small game hunters.

Safety

The mitigation, *"Notify Alaska press outlets of the annual MFE schedule for release in publications such as the Milepost, visitor and travel guides, and various newspapers"* will help keep the public informed. We recommend development of a specific website devoted to this information, as well as publishing in local outlets such as the Valley Frontiersmen and Delta News (web and hard copy) in addition to the Fairbanks News Miner and Anchorage Daily News, and physically posting notices at public and impromptu access points along the road system. In addition, the DEIS should recognize that hunters, trappers, fisherman, landowners, miners, agency personnel, and other users employ float, ski, and tundra tire equipped aircraft and light helicopters to access these popular and high-use areas. Private airfields (See Appendix D) do not capture the vast number of "off-field" areas used for access with this equipment. Avoidance by military aircraft, as well as SUAIS radio-coverage, must be implemented with recognition of these uses if public safety is to be maintained.

We also recommend that the training schedules with associated area or airspace restrictions be published as early as possible in the calendar year to allow residents, subsistence and recreation visitors to the area to coordinate plans for use of the area. Many hunting and other outdoor use plans are made many months in advance so that this type of information would be useful to visitors and reduce conflicts.

Watana – Susitna hydroelectric Project

The DEIS fails to recognize the Watana-Susitna Hydroelectric Project in the Fox 3 MOA. This major effort includes numerous engineering, wildlife, fisheries and habitat studies that all use small aircraft for access, surveys, aerial radio-telemetry, and mapping that will greatly increase VFR traffic for many years. For example, wildlife studies alone will approximately double the flight hours in the Fox 3 MOA to over 800 hours per year. The study areas for this project compose up to 500 square miles in the existing Fox 3 MOA. While a 5000 ft AGL floor poses little safety concerns, the high level of traffic associated with this project creates serious potential airspace conflicts

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at the lower 500ft AGL floor. Close coordination with the Alaska Energy Authority and associated agencies and contractors will be crucial to maintaining safety.

Civilian Airspace Management

We recommend meetings be scheduled on an annual or biannual basis and include ADFG staff participation. A commitment in the Record of Decision to conduct these meetings on a regularly scheduled basis would assist in ensuring that public input and the development of adaptive management is employed in this high public use area.

Coordinate with the FAA, ADFG, and local civilian aviation interests/stakeholders through the ACMAC, the U.S. Army Alaska Aviation Safety Standard Council, and other such forums to discuss and resolve issues of mutual interest affecting military and civilian airspace uses for existing and new SUA and restricted airspace on an annual or biannual basis.

Major Fighting Exercises (MFEs)

We recognize that expanded MFEs are integral to training needs in the JPARC; however, the September, December, January prohibition against MFEs will not adequately mitigate their affect on caribou and moose calving areas, sheep lambing and rutting areas, and popular hunting seasons. We recommend the following mitigation:

Conduct no MFEs during May 15 to July 15, August 10 to September 30, October 21 to November 31, and December, and January.

Spelling

We recommend a word search be performed to address spelling issues throughout the plan. For example Goodness River should be Goodnews River, and Paxon MOA should be Paxson MOA.

Page Specific Comments

Page 3-71. Hunting. Add ptarmigan to the primary species hunted in the area and revise the document to show that Dall sheep and goat seasons are not short, with the sheep season 40 days long and encompassing other high use seasons. There are no goat seasons within the proposed MOAs (there are few goats within the area).

Page 3-82: line 4. The vast majority of fish and wildlife surveys in the Proposed MOAs are conducted by the Department and not the land management agencies. The statement on line 6 regarding survey timing ("Mostly these occur in late summer/early fall and before the first snow") is incorrect. The routine survey schedule is as follows (surveys marked with asterisks are essential surveys that are conducted every year):

May 15 – June 10: Caribou parturition surveys*; moose twinning*, calf survival and periodic mortality surveys; occasional bear surveys.

June 20 – July 10: Caribou population estimate* and composition surveys*

Mid summer; Dall sheep surveys*

October 1-10: Caribou composition survey*

Following first adequate snow cover (~mid-October) and before Dec. 7: Moose population estimates*

May 5-June 5: Ptarmigan surveys (aircraft access)

Late March-Early April: Watana Su-Hydro winter range moose surveys* (scheduled for the next several years).

Monitoring of moose and caribou movements via aerial radio-telemetry: Year-around.

Page 3-82: Line 14. We appreciate that the DEIS recognizes the significant impacts of reduced access on livelihoods. It is important to also recognize that most of the Departments wildlife surveys are charter flights flown by small air taxi operators from around the region. Most of these operators also generate revenue from the transport of hunters, fishermen and other recreationists. A reduction in this economic activity could result in reduced availability of local air taxi operators for fish and wildlife surveys and monitoring, hindering the Departments ability to successfully manage fish and wildlife.

Page 3-82: Lines 22-24: It is misleading to state that avoidance of 1 or 3 NM allows access to private and public airports, respectively. Consider that, to avoid military training activities, aircraft will have to operated below 500' AGL enroute to the airport avoidance area. Many pilots will choose to avoid prolonged operation at below 500 ft AGL for safety purposes. Furthermore, mountainous terrain and windy conditions may further preclude safe flight at those low altitudes. These airports, as well as numerous "off-field" landing areas are critical for wildlife survey and animal capture activities. Also consider that "planning around military schedules" will likely have economic effects on aviation related business through reduction in overall activity and the generation of fees.

Page 3-84: Alternative E: Most of the comments above also apply to all action alternatives.

Page 3-97: Line 38. Harvesting subsistence resources is not a certain event. Thus a delays result in lost opportunity.

Page 3-97: Line 41. The stated intent of allowing for administrative survey flights to be conducted with minimal disruption is appreciated. Because of its importance and to ensure that it will be implemented in an agreed to manner, we request that date-specific mitigation efforts and agreements be specifically noted in the ROD for ease of reference.

Page 3-97: Line 43: See comments above for page 3-82, lines 22-24 above

Page 3-99 (Section 3.2.13.4 and elsewhere) Mitigations:

- No MFEs August 10 – September 30 and October 21 – November 30.
- No training activities below 5000 ft AGL to allow for essential wildlife surveys during the following periods:
 - May 15 – June 10
 - June 20 – July 10

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- o October 1-10
- o After first adequate snow cover (~mid-October) and before Dec. 7 (this request will vary from year to year depending on snowfall and can take 5 to 10 days to complete depending on weather conditions. This effort can be coordinated on a seasonal basis.

To improve coordination between the military and local subsistence users, we request the final document commit to scheduling annual or biannual meetings in effected communities to determine and seek solutions to identified issues related to the subsistence use of the area. We request the following changes to this mitigation measure.

The preceding analysis of effects on this resource has identified potential adverse impacts. The following preliminary mitigation is under consideration as possible ways to reduce these impacts.

All alternatives:

Expand consultation efforts with subsistence parties in the affected area on an annual or biannual basis to determine current subsistence use levels and areas on USAG-FWA lands as input into scheduling. Expand tribal consultation efforts with subsistence users about hunting and fishing programs on USAG FWA land. Continue to use a newsletter to provide information to subsistence users about existing and new military activities and the changes in access for subsistence users. Expand research and cooperative studies with Tribes to address possible effects of Air Force and Army activities on subsistence resources both directly within USAG-FWA installation boundaries and those outlying resources that may also be affected by military activities on DTA West, DTA East, YTA, and TFTA.

Appendix I

Page I-2. It appears that several plans in this appendix are outside the area of the plan and we question their inclusion in this plan. For example: Draft Revised Special Use Land Designation for the Togiak National Wildlife Refuge and Lower Goodnews River State DNR Hatcher Pass Planning, Chugach State Park, Nancy Lake State Recreational Area, BLM Bay Proposed Resource Management Plan and Final EIS.

Page I-43. The June 27 to July 11 flight avoidance area along the Delta River is inadequate to conserve Dall sheep lambing and rutting habitat. We recommend the flight avoidance period include May 15 to July 15 for lambing areas, and from November 15 to December 15 over rutting areas. We request annual contact with the Department to ensure these locations have not shifted or need adjustment.

Page I-48. We question the need to include game management units outside the area of the plan. These include GMU 9, 16, 17, and 19.

Appendix G

Page G-2, No. 9, Caribou - Overflights. Fox1 MOA, Fox2 MOA, and Proposed Paxson MOA should be included in this mitigation. We recommend increasing altitude and extending the minimum duration of the period to conserve the Delta Caribou calves during an important period of their life cycle and ensure their sustainability. The following modification to this mitigation measure will also allow for annual count/census and composition surveys necessary for us to continue to provide a popular hunting opportunity.

~~Protecting~~ Conserving the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet above ground level (AGL), over calving and post calving areas, in appropriate areas of the Fox1, Fox2, proposed Paxson, Birch, and Eielson MOAs from May 15 to ~~July~~ June 15. Annually contact ADF&G to determine specific areas of avoidance.

Page G-2, No. 10 Dall Sheep - Overflights. We recommend adding the proposed Paxson MOA to the list of areas establishing a minimum overflight altitude. This is needed to conserve Dall sheep in the mountainous region north of the Black Rapids. Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations. In particular:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),
- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

To encompass these concerns, we recommend the following mitigation measure be implemented:

~~Protect~~ Conserve Dall sheep by establishing a minimum overflight altitude of 5,000 feet AGL over lambing areas and spring mineral licks, in appropriate areas of Yukon 1, 2, 3, and 4, Buffalo, Eielson, Paxson, and Fox MOAs (nominally May 15 to July 15), and over rutting areas (nominally from November 15 to December 15). These areas will be identified during annual consultation with ADF&G prior to the May 15 and November 15 dates stated above.

Page G-3, No. 22 Aircraft, Habitat Protection. The document provides a good discussion of this important mitigation measure to protect important wildlife habitat in JPARC; however, to provide a more comprehensive list we request an annual meeting to update it. For example, we recommend adding the Oshetna River caribou calving grounds, Watana Creek caribou calving grounds, and the Eastern Talkeetna Mountains for Dall sheep populations. In particular, the mountains north and east of Chickaloon River, the mountain block between the Upper Talkeetna River northeast to Mt. Watana (west of Lower Kosina Creek), and the mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana, and east over to Jay/Coal Creek. We request the following change to this mitigation.

Avoiding the creation of aircraft noise around the Gulkana and Delta National Wild and Scenic Rivers, Tangle Lakes area, Richardson Highway, and trumpeter swan nesting areas within the Fox MOA eastern boundary. These areas will be updated during annual consultation with ADF&G prior to May 15.

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Appendix K, Mitigation Measures

Page K-11, Biological, 4th Proposed Mitigation. This mitigation measure should also apply to Fox3 MOA and the Proposed Paxson MOA. We also request a start date for this study.

Expand effort to conduct a detailed study to assess the impacts and effects of noise on wildlife, particularly key species, such as caribou and bison during critical life cycle seasons. Use information to include protection requirements within a noise management plan.

Page K-19, Land Use-Recreation. GMU 13 is an important moose and caribou hunting area, likely the most heavily used area in the state due to accessibility of the area to residents from Anchorage, the Matanuska Susitna Borough, and Fairbanks. In 2010, 5,015 individual moose hunters reported hunting in GMU 13, a number that has been steadily increasing since 2002. This increase is partially credited to the current active management programs which the state has invested significant time and energy to increase moose abundance for the benefit of consumptive users. Current objectives for moose are being achieved, with some additional increases planned. The overall management objective is to maintain a high level of harvestable moose with sufficient hunter participation annually to avoid habitat impacts. Caribou hunting is also highly popular with 4,887 hunters reporting hunting this area in 2010, with a peak participation of 19,397 hunters in 1996. As shown by the above discussion, GMU 13 is an important moose and caribou hunting area.

Currently, the EIS only lists Crosswind Lake and the Matanuska Valley Moose Range as hunting areas to avoid. However, the additional areas listed below support intense hunting for moose and caribou on a seasonal basis and should be added to the list. To accommodate this continued and important use, we request the following modifications to the first proposed mitigation measure shown on page K-19

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid- August 10~~ through September 20, ~~and October 21 to November 30,~~ and other important hunting seasons determined in annual consultation with ADFG. Locations to avoid include:

- *Crosswind Lake, ~~and~~*
- *Matanuska Valley Moose Range,*
- *Denali Highway between Cantwell and Paxson,*
- *Richardson Highway between Gulkana and Black Rapids,*
- *Tak Cutoff (Glenn Highway) between Gakona and Mentasta,*
- *The Gakona/Chistochina River drainages,*
- *Upper Susitna River drainage (above Tyone R),*
- *Brushkana River drainage,*
- *Coal Creek drainage,*
- *Watana Creek drainage,*
- *Upper Nenana River/Wells Creek area,*
- *Lake Louise/Susitna/Tyone Lake system,*
- *Maclaren River drainage,*
- *Tangle Lake system,*
- *Hungry Hollow/Paxson/Summit/Fielding Lake areas,*

- Swede Lake drainage in Hungry Hollow down to the Alphabet Hills (bordered on the south by the W Fork Gulkana River).
- Gillespie/June/Nita/Dick Lakes along the Richardson Highway south of Paxson.
- Nelchina Public Use Area from the Glenn Highway near Eureka north to the Susitna River.

Page K-21, Land Use – Recreation. The list of areas to avoid currently appears to consist primarily of BLM campgrounds. However, many additional popular trails for hunting and other recreating in the area exist and merit inclusion. Several trails exist up and down the MacLaren River, including the MacLaren Summit Trail to the north, and trails on both sides going generally north, and a trail on the west side going south. Another trail system extends through the Glacier Lake/Sevenmile Lake/MacLaren River, with an additional trail up the West Fork MacLaren River for XX miles. Other known popular trails include:

- Swede Lake Trail,
- Middle Fork Trail (heads west of Meier's Lake),
- Round Top trail which heads east of the Richardson Highway towards Round Top Mtn,
- Haggard Creek Trail,
- Ewan Lake Trails (one from the east and one from the south of the lake),
- Lake Louise/Crosswind Trail,
- Tolsona Lake/Crosswind Trail,
- Butte Lake Trail,
- Coal Creek trail (starts east of Butte Lake),
- Moore's Camp Trail (starts at Mile 51 on Denali Highway goes south over the mountain and down to a MacLaren River crossing),
- Top of the World Trail near Paxson/Black Rapids,
- Chistochina River Trail,
- Mankomen Lake Trail,
- Indian River Trail,
- Slana River Trail.
- There is a huge network of trails all through the Nelchina Public Use Area, dozens, starting with the Eureka/Little Nelchina Trails, north to the Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake, and east over to the Moore Lake/Grayling Lake/Marie Lake areas west of Lake Louise/Susitna.

To accommodate the use of additional popular trails in the area, we request the following modifications to the fifth proposed mitigation measure shown on page K-21.

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid- August 10 through September 20, and October 21 to November 30,~~ and other important hunting seasons determined annually with ADFG. Locations to avoid include:

- *Brushkana Creek campground,*
- *Tangle Lakes campground,*
- *Paxson Lake campground,*

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- Clearwater Wayside,
- One Mile Creek/Wolverine Mountain,
- Tangle Lakes trail,
- Gulkana River Raft trail,
- Costner Glacier trail,
- Sourdough campground,
- Lake Louise State Recreation Area,
- MacLaren Summit Trail,
- Glacier Lake/Sevenmile Lake/MacLaren River Trail System,
- West Fork MacLaren River Trail,
- Swede Lake trail,
- Middle Fork Trail,
- Round Top Trail,
- Haggard Creek Trail,
- Ewan Lake Trails,
- Lake Louise/Crosswind Trail,
- Tolsona Lake/Crosswind Trail,
- Butte Lake Trail,
- Coal Creek trail,
- Moore's Camp Trail,
- Top of the World Trail,
- Chistochina River Trail,
- Mankomen Lake Trail,
- Indian River Trail,
- Slana River Trail,
- Nelchina Public Use Area Trail System,
- Eureka/Little Nelchina Trails,
- Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail,
- Moore Lake/Grayling Lake/Marie Lake Trail,

Page K-24, Subsistence. The period prohibiting MFEs should encompass the period from 10 August – 30 September and 21 October – 31 November, instead of 20 August – September 20. This change will protect the most important subsistence hunting seasons for caribou and moose. We request the following modification,

No MFEs conducted during 10 August – 30 September and 21 October – 31 November ~~20 August – 20 September~~ in Fox 3 and expansion areas and new Paxon MOA. This restriction does not apply to US Army training or testing.

Page K-24, Subsistence. Biannual coordination meetings with the Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.

Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas underlying new MOAs consistent with current restrictions identified in the 1997 Alaska MOA EIS. These restrictions would include minimum overflight altitudes over Dall sheep lambing

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areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.

Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.

Modify existing Letter of Agreement with ADFG to avoid overflight of caribou and moose calving areas, and sheep lambing, mineral licks and rutting areas in Fox 3 expansion areas and new Paxon MOA.

Page K-25, Subsistence. We support these approaches, but request that the final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.

Conduct annual or biannual meetings with regulating agencies and with communities dependent on subsistence resources under new airspace with a view to monitor impacts of Air Force activities on subsistence. Information would be used to adjust flight avoidance locations, or to add new ones.

Update the current SUAIS to include information on MOA activation and provide advanced notice of MFEs to communities and management agencies that use and access lands underlying the Fox 3 MOA, the Fox 3 expansion areas, and the new Paxon MOA.

Sincerely,


Craig L. Fleener
Deputy Commissioner

G0023

[REDACTED]

From: Lisa Herbert [REDACTED]
Sent: Monday, July 09, 2012 6:18 PM
To: ALCOM J08 Admin Box
Subject: Fairbanks Chamber Comment Letter on DRAFT JPARC EIS
Attachments: Fairbanks Chamber Comment Letter for DRAFT JPARC EIS.pdf

Please see attached letter that was adopted by the Fairbanks Chamber's Board of Directors at their meeting this afternoon.

Thank you,

Lisa Herbert | Executive Director | **Greater Fairbanks Chamber of Commerce**
100 Cushman Street, Suite 102, Fairbanks, AK 99701 | O: (907) 452-1105 | D: (907) 374-6706 | C: (907) 347-8006
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G0023

July 9, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaska Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

RE: Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS)

Dear Sir,

The Greater Fairbanks Chamber of Commerce would like to take this opportunity to comment on the referenced Draft JPARC EIS.

The Fairbanks Chamber supports the United States Air Force and the United States Army and its missions in Alaska and welcomes the expansion of the JPARC to accommodate modern and future training needs. We support the increased use of the JPARC and its planned expansion as this action is beneficial to the training of our military and the defense of our Nation, with no unmanageable negative impacts on our community under the current force structure at Eielson Air Force Base and Fort Wainwright.

The JPARC military training ranges and facilities, as a whole, far surpass in quality and quantity those found in other U.S. locations. The sheer size of the ranges:

- allows for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems;
- allows for the Air Force to fly at combat speeds well over Mach 1;
- allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and
- results in the finest training opportunities for soldiers, sailors, and airmen within the United States.

A recent proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamic of the JPARC and affect our support for JPARC use and expansion.

The Fairbanks Chamber encourages the military to consider expansion of their missions and manning within Interior Alaska, and in return we will consider supporting associated reasonable requests to increase Alaska land and air space usage that accommodates this increased military activity. However, we will reconsider our position of support if the military proposes actions that may lead to a reduction of missions and manning in Interior Alaska

Mission: The Greater Fairbanks Chamber of Commerce represents our members by advocating for a healthy economic environment and by building partnerships that promote the greater Fairbanks area as an attractive place for business and community.

INVESTORS

DIAMOND

- BP Exploration
- ConocoPhillips
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- Fairbanks Daily News-Miner
- Fairbanks Memorial Hospital & Denali Center
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- Mt. McKinley Bank
- Santina's Flowers & Gifts

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- Birchwood Homes
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- University of Alaska Fairbanks
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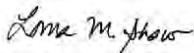
without a corresponding reduction in military restrictions and use of Alaska land and air space assets.

We also encourage DOD to continue to work cooperatively and closely with the State of Alaska to develop the natural resources within the JPARC and the surrounding environment.

Thank you for the opportunity to offer comment on the *Draft JPARC EIS*. The Greater Fairbanks Chamber of Commerce looks forward to continuing a productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,

GREATER FAIRBANKS CHAMBER OF COMMERCE



Lorna Shaw
Board of Directors, Chair



Lisa Herbert
Executive Director



Steve Lundgren
Military Affairs, Chair

Cc: Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell
Brigadier General James Post, 354th Fighter Wing
Colonel Michael McCurry, US Army Alaska
Colonel Ronald Johnson, Fort Wainwright Garrison
AMFAST
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Alaska State Chamber of Commerce
Greater Fairbanks Chamber of Commerce Membership

Mission: The Greater Fairbanks Chamber of Commerce represents our members by advocating for a healthy economic environment and by building partnerships that promote the greater Fairbanks area as an attractive place for business and community.

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From: Steele, Marie C (DNR) [REDACTED]
Sent: Monday, July 09, 2012 4:38 PM
To: ALCOM J08 Admin Box
Cc: Crafford, Thomas C (DNR); Dyok, Wayne M (AIDEA); Parsons, Martin W (DNR); Phelps, Bruce G (DNR); Klein, Joseph P (DFG)
Subject: Joint Pacific Alaska Range Complex EIS Comments
Attachments: JPARC Modernization and Enhancement Draft EIS Comments_AEA_ADNR OPMP.pdf

Thank you for the opportunity to provide comment on the JPARC Modernization and Enhancement EIS. As the Alaska Department of Natural Resources Large Project Coordinator for the proposed Susitna-Watana Hydroelectric Project, I am forwarding the attached letter from the Alaska Energy Authority (AEA), the proponent for the Susitna-Watana project. Please reply with confirmation that the comments have been received by your offices.

The Susitna-Watana project information is relative to the JPARC Modernization and Enhancement EIS as the hydroelectric project anticipates construction of a 7000-foot long runway to accommodate Boeing 737 aircraft and construction of transmission lines connecting into the existing Railbelt transmission system. The attached letter provides information on the project area, the anticipated activities, transportation corridor alternatives, and the estimated project schedule for the Susitna-Watana Hydroelectric Project.

Please do not hesitate to contact myself or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information.

*Marie Steele, Large Project Coordinator
Office of Project Management and Permitting
Alaska Department of Natural Resources
550 W. 7th Ave., Suite 1430
Anchorage, Alaska 99501-3577
Office: (907) 269-8473*

G0024



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT & PERMITTING

550 West Seventh Avenue, Suite 1430
Anchorage, Alaska 99501
Main: 907.269.8690
Fax: 907.269.5673

July 9, 2012

Alaskan Command Office of Public Affairs
9480 Pease Ave, Ste 120
JBER, AK 99506-2100

RE: Submittal of comments concerning the Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska (JPARC Modernization and Enhancement EIS)

Thank you for the opportunity to provide comment on the JPARC Modernization and Enhancement EIS. As the Alaska Department of Natural Resources Large Project Coordinator for the proposed Susitna-Watana Hydroelectric Project, I am forwarding the attached letter from the Alaska Energy Authority (AEA), the proponent for the Susitna-Watana project.

The Susitna-Watana project information is relative to the JPARC Modernization and Enhancement EIS as the hydroelectric project anticipates construction of a 7000-foot long runway to accommodate Boeing 737 aircraft and construction of transmission lines connecting into the existing Railbelt transmission system. The attached letter provides information on the project area, the anticipated activities, transportation corridor alternatives, and the estimated project schedule for the Susitna-Watana Hydroelectric Project.

In addition to the points raised by the AEA, it is important to note an increased level of public recreational use is expected due to the reservoir behind the dam, as well as lighting and electrical "noise" due to the hydroelectrical power generation.

Further information relating to Alaska's long range electrical generation capital improvement projects can be found in the Regional Integrated Resource Plan (RIRP), at <http://www.akenergyauthority.org/regionalintegratedresourceplan.html>.

Please do not hesitate to contact myself, or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marie Steele".

Marie Steele, Large Project Coordinator
Alaska Department of Natural Resources

G0024

Attachment: Alaska Energy Authority (AEA) comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS).

cc:

Thomas Crafford, Director DNR, Office of Project Management and Permitting (OPMP)
Martin Parsons, Deputy Director, DNR Division of Mining, Land, and Water (DMLW)
Bruce Phelps, Section Chief, DMLW Resource Assessment & Development Section (RADS)
Joseph Klein, P.E., Alaska Department of Fish and Game Aquatic Resources Unit (ADFG ARU)
Wayne Dyok, P.E., AEA Project Manager, Susitna-Watana Hydroelectric Project

AEA Comments JPARC Modernization and Enhancement EIS

G0024



July 9, 2012

INTRODUCTION

The Alaska Energy Authority (AEA) appreciates the opportunity to provide comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS). AEA is in the process of conducting environmental and engineering studies for the Susitna-Watana Hydroelectric Project to support a license application to the Federal Energy Regulatory Commission (FERC). AEA initiated the formal licensing process in December 2011 with the filing of a Pre-Application Document to FERC. Construction of the Susitna-Watana Project is expected to occur from 2017 through 2023, after which the facility will be placed in operation with a life of 100 years or more.

The Susitna-Watana Project would be located in the FOX 3 Military Operations Area (MOA). There is a potential for conflicts particularly because of AEA's need for and use of an airstrip to construct and operate the hydropower project and the military's need for low-altitude threat training, as well as other activities. AEA would like to ensure that the military's proposed actions would not adversely affect the construction and operation of the Susitna-Watana Project and vice versa. AEA proposes to meet with the Department of Defense (DOD) to discuss how both programs can coexist. We request further that the DOD consider the cumulative effects of the Susitna-Watana Project in the Final EIS.

DESCRIPTION OF SUSITNA-WATANA PROJECT

This section provides a brief overview of the Project location, facilities and proposed operational characteristics. For more detail regarding the Project facilities and operational characteristics, please refer to the PAD (AEA 2011; available on the Susitna-Watana Hydroelectric Project website, <http://www.susitna-watanahydro.org>). The proposed Project is located in the Southcentral region of Alaska, approximately 120 miles (mi) north-northeast of Anchorage and 110 mi south-southwest of Fairbanks. The Southcentral region of the state is geographically bounded by the Alaska Range to the north and west, the Wrangell Mountains to the east, and the Talkeetna Mountains to the south. This region encompasses 86,000 square mi of the total 586,000 square mi of the state. As proposed, the Project would include construction of a dam, reservoir and power plant on the Susitna River starting at river mile (RM) 184, approximately 34 mi upstream of Devils Canyon. Transmission lines connecting into the existing Railbelt transmission system and an access road would also be constructed.

Transportation Access

There would be both temporary and permanent site access facilities to provide a transportation system to support construction activities, and to facilitate orderly development and maintenance of the Project. The current planning assumes restricted public access during construction for

akenergyauthority.org

813 West Northern Lights Boulevard, Anchorage, Alaska 99503 T 907.771.3000 Toll Free (Alaska Only) 888.300.8534 F 907.771.3044

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safety considerations. Another goal is to co-locate access roads and transmission facilities, to the extent possible, in the same corridor to minimize environmental impacts

Three possible alternatives for access roads and transmission lines have been identified for the Project (Figure 1). Two of the alternatives would accommodate east-west running transmission lines in combination with a new site access road connecting to the Anchorage-Fairbanks Intertie Transmission line and the Alaska Railroad. One of these corridors, designated as the Chulitna Corridor, would run north of the Susitna River, and extend to the Chulitna siding area. The other alternative, designated as the Gold Creek Corridor, would run south of the Susitna River, and extend to the Gold Creek area. A third corridor, designated as the Denali Corridor, would run due north, connecting the Project site to the Denali Highway by road over a distance of about 44 mi. If a transmission line is constructed along this corridor, it would be extended westward along the existing Denali Highway and connect to the Alaska Intertie near Cantwell.

If the Denali Corridor is selected the affected sections of the Denali Highway will be upgraded in order to facilitate safe construction of the Project. The Denali Highway would not be a part of the Project.

Regardless of which road is chosen, the majority of the new road will follow terrain and soil types that allow construction using side borrow techniques, resulting in a minimum of disturbance to areas away from the alignment. A berm type cross section will be formed, with the crown of the road being approximately 2 to 3 ft above the elevation of adjacent ground. To reduce the visual impact, the side slopes will be flattened and covered with excavated peat and other naturally occurring materials. A 200-foot right-of-way will be sufficient for this type of construction.

Permanent access to the Watana Dam site will connect with the existing Alaska Railroad either at Chulitna, Cantwell or Gold Creek, where at the chosen location a railhead and storage facility occupying up to 40 ac will be constructed alongside the existing passing bays. New sidings of a length up to 5,000 ft will be constructed so that off-loading and transfer of goods and materials can take place without interrupting the operations of the Alaska Railroad Corporation (ARRC). This facility will act as the transfer point from rail to road transport and as a backup or interim storage area for materials and equipment, and as an inspection and maintenance facility for trucks and their loads. Within the 40 ac would be a small residential camp for drivers trucking equipment to the construction site, for laborers and staff operating the transfer, and for support staff such as cooks and maintenance workers.

If the Denali Corridor is chosen for road access, in the community of Cantwell the pavement on the first section of the Denali Highway will be extended for a distance of approximately 4 mi to eliminate any problem with dust and flying stones. In addition, the following measures will be taken:

- Speed restrictions will be imposed along appropriate segments;

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- Improvements will be made to the intersections including pavement markings and traffic signals.

Electric Transmission Facilities

The transmission lines will begin at Watana Dam and consist of three single-circuit 230-kV lines. The same three corridors under consideration for the access road are also those under consideration to connect the Project primary transmission lines to the Alaska Intertie. Depending on which corridor is chosen, the transmission system will include a switching station in the point of tie in (either at Chulitna, Gold Creek or Cantwell). From the Watana substation, the transmission corridors are essentially co-located with the corridors for the access roads except for two specific areas:

- 1) For the northern westward route (Chulitna Corridor), only the first five mi of the twin 230-kV transmission lines will not follow the coincident road corridor. The two lines will cross the river from the switchyard (together with the line destined for the northern route) in a northerly direction for two mi, after which the two lines will turn northwesterly to cross Tsusena Creek and three mi later will intersect the Chulitna road corridor. At the extreme westerly end of the corridor, it will widen to facilitate the divergence of the road and the transmission line which will continue to a switching station on the Alaska Intertie.
- 2) For the southern westward route (Gold Creek Corridor) the transmission lines would not follow the planned road corridor, rather the transmission lines can span the rough topography running more parallel to the Susitna River. Near the westerly end of the corridor, both the transmission lines and road can be co-located into one single corridor all the way to Gold Creek where the transmission lines would terminate in a new switching station on the existing Alaska Intertie.

For the northern route, the only divergence between the road and transmission line corridor will occur at Deadman Lake, at which location the road will be aligned west of Deadman Hill, while the transmission will follow a lower elevation corridor on the east of the hill. Both corridors will rejoin some 9 mi later on the north side of the Deadman Hill. At the Denali Highway, the northern transmission corridor will turn west and continue along the Denali Highway to the Cantwell switching station.

The right-of-way for the transmission lines within the corridors will consist of a linear strip of land. The width will depend on the number of lines. The transmission rights-of-way will be 200, 300, or 400 feet, depending on whether one, two, or three lines run in parallel.

The switching and substations will occupy a total of approximately 16 ac.

Rights-of-way for permanent access to switchyard and substations will be required linking back to the permanent site access road. These rights-of-way will be 100 ft wide.

Access to the transmission line corridors will be:

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- a) Via unpaved vehicle access track from the permanent access roads at intermittent points along the corridor. The exact location of these tracks will be established in the final design phase.
- b) By helicopter, where there is no access road projected.

Within the transmission corridor itself an unpaved vehicle access track 25 ft wide will run along the entire length of the corridor, except at areas such as major river crossings and deep ravines where an access track would not be utilized for the movement of equipment and materials.

Dam and Reservoir

As currently envisioned, the Project would include a large dam with a 20,000-acre (ac) reservoir. The type and height of dam construction are still being evaluated as part of ongoing engineering feasibility studies, but early comparisons have demonstrated that it will most likely be a roller-compacted concrete structure. The dam has a nominal crest elevation at elevation (El.) 2,025 ft mean sea level (msl) corresponding with a maximum height of approximately 700 ft above the foundation and a crest length of approximately 2,700 ft. Following completion of the studies mentioned above, a nominal crest elevation up to El. 2,125 ft msl may be proposed in the license application, corresponding to a maximum dam height of up to 800 ft above the foundation.

The Watana Reservoir, at normal operating level of El. 2,000 ft msl, will be approximately 39 mi long with a maximum width of approximately 2 mi. The total water surface area at normal operating level is approximately 20,000 ac. The minimum reservoir level will be 1,850 ft msl during normal operation, resulting in a maximum drawdown of 150 ft. However, a maximum drawdown of up to 200 feet is still being considered. The reservoir will have a total capacity of 4.3 million ac-ft, of which 2.4 million ac-ft will be active storage.

Construction materials for the dam and appurtenant structures will utilize, as far as possible, rock from the structure excavations to minimize the quarry development. Stable excavations and rock cuts will be designed with suitable rock reinforcement and berms.

Thick alluvial deposits will be removed from the river bed in order to found the dam on sound bedrock.

Hydroelectric Facilities

The powerhouse will be located immediately downstream of the dam, and will house three generating units, each with a nominal capability of 200 MW unit output under average net head (which will be close to the design head) for a total plant capacity of 600 MW under average head. However, based on discussions with Railbelt utilities regarding electrical system reliability, AEA may propose four units with a nominal capacity of 150 MW and a total capacity of 600 MW. The capacity of the Project eventually proposed for licensing could extend up to

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800 MW. The exact sizing and number of units may change as a result of further transmission system studies.

The average annual energy of the project will be 2,500,000 megawatt hours. The powerhouse will be designed and constructed with an extra empty generating unit bay for the potential installation of a fourth unit at some future time. Optimization studies are ongoing.

There would be two outlet works facility structures and four power intake structures (one corresponding to the extra unused powerhouse bay). The outlet works facility in conjunction with the three powerhouse units will be sized to allow discharge of a 50-year flood before flow would be discharged over the spillway.

Ancillary Facilities

Construction of the Watana Dam site development will require various facilities to support the construction activities throughout the entire construction period. Following construction, the operation of the Project will require a small permanent staff and facilities to support the permanent operation and maintenance (O&M) program.

The most significant item among the temporary site facilities will be a construction camp (Figure 2). The construction camp will be a largely self-sufficient community normally housing approximately 800 persons, but with a peak capacity of up to 1,000 people during construction of the Project. After construction, it is planned to remove most of the camp facility, leaving only those aspects that are to be used to support the smaller permanent residential and operation and maintenance facilities.

Other site facilities include contractor work areas, site power, services, and communications. Site power and fiber optic cabling will be brought either on the transmission line route, or along the side of the access road. Items such as power and communications will be required for construction operations, independent of camp operations.

Permanent facilities will include community facilities for O&M staff members and any families. Other permanent facilities will include maintenance buildings for use during operation of the power plant.

AEA plans to construct a 7000-foot long runway that would accommodate Boeing 737 aircraft (Figure 2). The runway would like be constructed on the north side of the Susitna River, east of the proposed dam site.

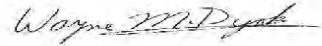
SUMMARY

AEA appreciates the effort put forth by the DOD in preparing the Draft EIS. AEA will be conducting detailed environmental studies within the FOX 3 MOA over the next three years in anticipation of submitting its FERC license application for the Susitna-Watana Project. We

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welcome the opportunity to work with DOD to ensure that the goals of JPARC and AEA can both be met. Please contact the AEA Project Manager, Wayne Dyok, at 907-771-3955 should you require further information on the project.

Very truly yours,



Wayne M. Dyok, Project Manager

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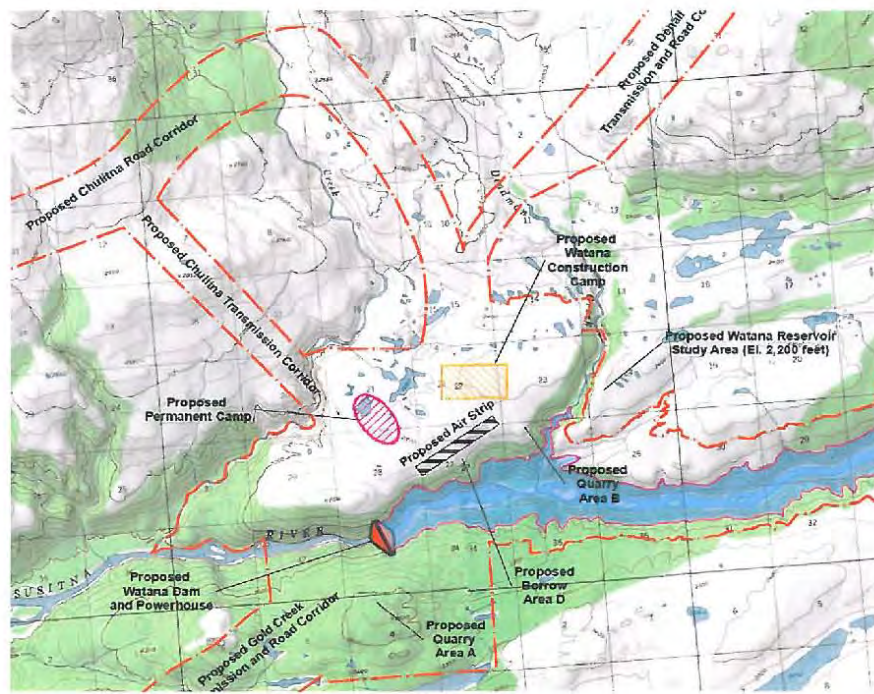


Figure 2 Project Site

G0025

[REDACTED]

From: [REDACTED]
Sent: Monday, July 09, 2012 6:15 PM
To: ALCOM J08 Admin Box
Subject: FAA - Western Service Center, Operations Support Group Response to JPARC Draft EIS
Attachments: JPARC Comment Response Matrix.docx

To Whom it May Concern,

Please find the attached response to your Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace and Training Areas in the JPARC in Alaska. A paper copy with cover sheet will be delivered to the project address by mail. Thank you for the opportunity to comment.

Respectfully,

Michele Cruz

Michele L. Cruz
Contract Support (NISC III)
AJV-W2, Western Operations Support Group
LOCKHEED MARTIN CORPORATION

[REDACTED]

G0025

Comment Response Matrix
Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

#	Location		Page	Line	Section	Comment Reviewer	Response
	Page	Section					
1	20	2.1.3.1	21-23			The BAX (if approved) should only be usable on a daily basis from SFC to 5999 MSL. The airspace above should be with the same time parameters (if at all) as the Delta MOA. If released above 5999MSL on a daily basis, will result in a negative impact the National Airspace System as stated in the letter dated March 11, 2011.	
2	2-4	Table				Alternative "A" for the proposed FOX 3 MOA extends too far south and west. As stated in the Letter from Anchorage Center on March 11, 2011. This would have a negative impact on the National Airspace System as well as Anchorage Center. This statement applies throughout the document where the proposed FOX 2 MOA is addressed	
3	32	Table				Transition between R2205 and R2202 – The altitudes on this transition are unrealistic. This would be a major impact to Customers of the National Airspace system and Anchorage Center. 7000 MSL would be the highest altitude Anchorage Center could recommend.	
4	ES-1 6		7, 10			The word "mostly" is contained throughout the document. Suggest modifying the verbiage to more concise terms. Stating you will be mostly using existing targets and impact areas indicates additional impact areas will be impacted.	
5	1		12			The FAA is a cooperating agency based in part on the DoD FAA MOU found in Appendix 7 of FAA Order 7400.2 which state that "When the DoD proposes that the FAA establish, designate, or modify SUA, the FAA shall act as a cooperating agency for the evaluation of environmental impacts." Suggest adding verbiage referring to the MOU in both Chapter 1 and in the Executive Summary.	
6	32	1.6.1	10			Recommend rewording the sentence stating "FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways" to be in line with FAA Order 7400.2 Section 2, 1-2-1 which states: "The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of aircraft and its efficient use."	
7	All					Suggest doing a "FIND" function and use nonparticipating instead of civilian throughout the document	

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Comment Response Matrix
 Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

#	Location		Section	Comment Reviewer	Response
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8	5	20	2.1.1.1.1	Other times by NOTAM is something that should be more clearly spelled out. Especially if this has the potential for being a daily event	
9	2-6		Table 2-3	Add "ATCAA" to Paxton in the second section	
10	2-6	8	2.1.1.1.1	Data is 4-6 years old now	
11	3-32	12	3.1	Believe "no to" is a typo. The line does not make sense, please clarify.	
12	General	General	General	As per FAA comments given March 2011: The close proximity of the proposed Fox 3 & Paxton MOA remains a concern due to its close proximity to Anchorage Terminal Radar Approach Control's airspace.	
13	3-178	1	3.3	See comment 1 on the BAX	
14	3-190		Figure 3-26	Noise contour levels indicate that currently there are no baseline peak blast noise levels in the 130dB contour and there are several additions to that under the proposed action (pink contours). However, if it is indicated in the verbiage on page 3-187 line 31 that there are no impact areas not already affected by current conditions. Please clarify.	
15	3-282.1		3.6 All	Currently is against FAA policy to establish or designate airspace solely for the use of UAV/UASS.	
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U.S. Department
of Transportation
Federal Aviation
Administration

Federal Aviation Administration

1601 Lind Avenue Southwest
Renton, Washington 98057

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

RE: Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges,
Airspace and Training Areas in the Joint Pacific Alaska Range Complex

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace and Training Areas in the Joint Pacific Alaska Range Complex. Please note our ability to perform a detailed analysis of the Draft EIS is limited by the absence of an accompanying Draft Aeronautical Proposal for Modification of Special Use Airspace (SUA). Development and submittal of a Draft Aeronautical Proposal initiates an aeronautical study by the FAA to evaluate impacts to the National Airspace System (NAS), which can influence the ultimate configuration of the proposed airspace.

SUA proposals are subject to both environmental and aeronautical processing requirements. Although they are distinct and separate actions, they require closely coordinated efforts. The aeronautical study can significantly impact the environmental study, leading to unnecessary costs and delay. Similarly, the environmental study can significantly impact the aeronautical study.

We highly encourage your team to continue development of a Draft Aeronautical Proposal in coordination with Anchorage Air Route Traffic Control Center as well as Anchorage and Fairbanks Approach Controls.

Attached are comments/concerns found during the review of the EIS.

Thank you for the opportunity to comment. We look forwards to continuing the positive and long lasting relations the FAA has with the DoD.

Sincerely,

John Warner
Manager, Operations Support Group
Western Service Center

Attachment:
JPARC Comment Response Matrix

G0025

Comment Response Matrix
 Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

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7	All		Suggest doing a "FIND" function and use nonparticipating instead of civilian throughout the document		

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Comment Response Matrix
Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

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[REDACTED]

From: Leaphart, Stanley E (DNR) [REDACTED]
Sent: Monday, July 09, 2012 7:52 PM
To: ALCOM J08 Admin Box
Subject: Comments on JPARC Draft EIS
Attachments: CACFA Comments JPARC DEIS.pdf

Attached please find our comments on the JPARC Draft EIS. Thank you.

*Stan Leaphart
Executive Director
Citizens' Advisory Commission
on Federal Areas
3700 Airport Way
Fairbanks, AK 99709
907.374.3737*

G0026

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

**SEAN PARNELL,
Governor**

3700 AIRPORT WAY
FAIRBANKS, ALASKA 99709

PHONE: (907) 374-3737
FAX: (907) 451-2751

July 9, 2012

Lt. General Steve Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 120
Joint Base Elmendorf-Fort Richardson, Alaska 99506

Dear Lt. General Hoog:

The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (DEIS).

The Citizens' Advisory Commission on Federal Areas is a 12 member organization established by the State of Alaska in 1981 and reauthorized in 2007. Alaska Statute (AS) 41.37.220 directs the Commission to "consider, research, and hold hearings on the consistency with federal law and congressional intent on management, operation, planning, development, and additions to federal management areas in the state [and] on the effect of federal regulations and federal management decisions on the people of the state."

We appreciate the opportunity to provide comments on the important proposals contained in the JPARC EIS. We also are thankful for the extension of the public comment period. ALCOM has made a notable effort to reach out to the affected communities across Alaska with its public meeting schedule and through the *ad hoc* Working Group meetings since public scoping began for the DEIS. Extending the comment period also demonstrates a commitment to the public process and to the affected public by allowing more time to review and analyze a lengthy and complicated document. Please accept the following comments.

The Commission recognizes the crucial role the military plays in defending our nation. We support the Department of Defense's mission and understand the need for training areas to ensure the readiness of our military forces. Commission members do, however, have concerns about the potential impacts from the proposed expansion of some of those training areas as well as other elements of the proposals outlined in the DEIS.

The Commission fully understand the vital role the military plays in Alaska's economy. At the same time, the civil aviation industry makes significant economic contributions to the state.

G0026Lt. General Steve Hoog
JPARC Draft EIS

July 9, 2012

According to the Aircraft Owners and Pilots Association, the civil aviation industry in Alaska contributes approximately \$3.5 billion to the state's economy and supports an estimated 47,000 directly and indirectly related jobs.¹ In addition, civil aircraft routinely provide the most economical and feasible means of travel for Alaskans as well providing the primary method of access for utilizing many of the resources of the state. It is essential that a balance be struck between the military's operational and training needs and those of the civilian population as they are supported by the civil aviation industry.

FOX 3 MOA Expansion and New Paxon MOA

The proposed expansion of the Fox 3 Military Operations Area (MOA) and designation of a new Paxon MOA represent a significant expansion in the amount of Alaskan airspace directly affected by military training activity. Under Alternative A the amount of airspace included within MOAs in this region of the state would more than double, increasing from 3,138,000 acres (4,903 sq. miles) to 7,531,000 acres (11,767 sq. miles). Under Alternative E, MOAs would increase in size to 6,401,000 acres (10,001 sq. miles).

The Commission has heard from members of the public who are concerned that 2/3 (67%) of the lands affected by the existing MOA and the proposed expansion areas are State owned. They find it disconcerting that with 60% of the lands in Alaska federally owned, the lands most impacted by the proposals in the DEIS are state lands. Many Alaskans believe that it would be more appropriate to designate MOAs over federal lands.

The information in Table 3-12 *Land Status* should be revised to more accurately reflect actual land status in the Fox 3 MOA and the proposed Paxon MOA. The **Notes** section for Table 3-12 defines State land as including State patented, State tentatively approved and State land disposals. State land disposals are not State lands; they are lands that have been placed in private ownership. They should be included in Table 3-12 under **Private**. Under Note 4, private lands should also include Native allotments. Also, by definition, there is no such thing as "privately owned BLM land." We assume that this category would include homesites, trade and manufacturing sites, homesteads and patented federal mining claims that have been conveyed into private ownership.

The DEIS indicates that the proposed expansion of the FOX 3 MOA and designation of a new Paxon MOA have the potential for significant adverse impacts to airspace management and use, noise levels, flight safety, land management and use, recreation and socioeconomics and that management actions or mitigations are required to avoid or reduce impacts. The Commission agrees with this assessment. In addition, should the Fox 3 MOA be expanded and/or the Paxon MOA designated, we generally support the proposed mitigations outlined in Table K-2 of Appendix K.

The public has expressed significant concern with the expansion of the FOX 3 MOA and the creation of the Paxon MOA. Of even greater concern is the proposal to lower the minimum altitude restriction for military aircraft from 5,000 feet AGL to 500 feet AGL. The area that

¹ *The Economic Contribution of the Aviation Industry to Alaska's Economy – prepared by Northern Economics, Inc., Anchorage, Alaska for the Alaska Department of Transportation, January 2009*

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would be included in the proposed expansion is used extensively by general aviation pilots, air taxi operators and transporters to support hunting camps and mining operations, conduct air tour operations, access recreational areas or make other uses of this region. Given its proximity to Fairbanks, Anchorage, the Mat Su Borough and the Copper River Basin, the airspace is heavily used by civilian aircraft throughout the year. Lowering the minimum altitude to 500 feet AGL greatly increases the collision potential with high-speed military aircraft engaged in training maneuvers in the Fox 3 MOA. Because of the heavy use of the proposed Fox 3 expansion area for access to the southern Alaska Range, the Denali Highway, the Nelchina Basin and the Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet AGL, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

The Commission is disappointed that there is no high altitude only alternative for the proposed Paxon MOA which covers Isabel Pass and portions of the Eastern Alaska Range. During scoping, there was considerable public concern about the potential negative impacts to civilian air operations from military aircraft operating as low as 500' AGL if this MOA is designated. Isabel Pass is a major Visual flight Rules (VFR) route for civilian aircraft. It links northern and interior Alaska with south central and southeastern Alaska. As with the proposed Fox 3 expansion area, this route is used extensively by civilian aircraft to access hunting and fishing areas, private cabins and homesites, mining operations and small airstrips on the southern flanks of the Alaska Range. We do note that the low altitude Paxon MOA would extend from 500 feet AGL up to but not including 14,000 feet MSL and the MOA would only be used during major flying exercises (MFE).

The DEIS (Appendix K, page K-9) proposes the following mitigation for the Fox 3 MOA and the proposed Paxon MOA is designated:

"Establish or expand existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace."

While designation of specific VFR flyway corridors may be realistic in the Fox 3 MOA, the highly variable weather in the area of the proposed Paxon MOA makes designation of a single corridor unfeasible. It would also concentrate VFR traffic in an already limited area and increase the potential for a mid air collision between civilian and military aircraft. We strongly suggest that if the Paxon MOA is designated, it should be limited to high altitude use only.

The DEIS states there is a potential for adverse impacts on biological resources, public access, and subsistence, but that impacts are not expected to be significant and that management actions or mitigations may be required to avoid or reduce impacts. The Commission believes that the potential exists for significant adverse impacts to these three resources. We suggest the development of mitigation measures for inclusion in the final EIS and Record of Decision.

The DEIS acknowledges in the footnotes for Table 3-11 that while caribou are prevalent throughout the Fox 3 MOA, calving and breeding occur predominately in the proposed expansion area. The footnote for Dall sheep in Table 3-11 states that they are most prevalent

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in the Fox 3 expansion area and the proposed Paxon MOA, but that no “calving” (should be lambing) is identified. Table 3-11 contains similar information that habitat, including nesting habitat, for ducks, geese and trumpeter swans is also prevalent in the proposed Fox 3 expansion area and proposed Paxon MOA. There is little additional discussion of the use of the proposed Fox 3 expansion area for caribou calving and breeding in the affected environment section of the DEIS. More information should be included in the final EIS (FEIS).

In spite of the proposal to include important caribou breeding and calving habitat, waterfowl nesting areas and other wildlife concentration areas in the proposed Fox 3 MOA extension and the proposed Paxon MOA, the DEIS (Appendix K, Page K-11) proposes only the following mitigation measure:

“Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”

Because of the importance of this area and its wildlife resources for a wide range of uses and user groups, the Commission submits that simply monitoring the effects of training overflights is not sufficient to protect those resources. Previous studies and surveys have established the effects of these types of activities on biological resources.

The FEIS and ROD should include specific mitigation measures for caribou and moose during calving and post-calving periods in the existing Fox 3 MOA and for the proposed expansion area, including the proposed Paxon MOA. Based on our discussions with ADF&G biologists and others, the Commission suggests that a minimum elevation of 5,000 feet AGL be maintained from May 15 through July 15 throughout the existing Fox 3 MOA, including any expansion area. This will reduce stress on the Nelchina Caribou Herd during critical calving and post-calving period.

The DEIS lists an existing mitigation measure (Reference ID 429, Appendix K, pg. K-6) for the Delta Caribou Herd calving areas which established a minimum overflight altitude of 3,000 feet AGL from May 15 to June 15. The Commission suggests modifying the mitigation by increasing the minimum altitude to 5,000 feet AGL and extending it from May 15 to July 15.

We also suggest adoption of the same May 15 to July 15 flight restriction of 5,000 feet AGL for moose in both the Fox 3 MOA and the proposed Paxon MOA. Even though moose do not have concentrated calving areas, they are susceptible to low level, high speed aircraft overflights during calving and post calving periods.

The Commission supports the proposed mitigation for the FOX MOA and the proposed Paxon MOA to allow supersonic operations only above 5,000 feet AGL or 12,000 feet MSL, whichever is higher

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Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all parties.

Special Use Airspace Information Service

The Special Use Airspace Information Service (SUAIS) has been successful in making civilian pilots aware of planned and ongoing military aircraft activity in the JPARC airspace complex. AOPA has indicated that the SUAIS has greatly improved the situational awareness of both civil and military airspace users. However, also according to AOPA, pilots have reported that in the eastern portion of the existing complex communications are not adequate. The result has been difficulties with the mix of civil uses and military training flights.

While we understand that the SUAIS recently has been upgraded to increase radio coverage by reactivating one of the VHF radio repeaters, any further expansion of the airspace complex will only increase problems unless radio coverage, staffing and other necessary components of the SUAIS are expanded proportionally to allow civilian pilots to communicate with Range Control when MOAs are active.

The DEIS (Appendix K, page K-8) proposes the following mitigation measure:

“Pursue funding for any communications enhancements that may be needed to expand coverage within those expanded SUA areas.”

We suggest that committing only to “pursue funding” is not satisfactory. ALCOM should develop a plan to identify what is required for expansion of the SUAIS to ensure sufficient and reliable communication between civilian pilots and the military. A workable plan and funding to implement the plan should be in place before any expansion of the Fox 3 MOA or the designation of the Paxon MOA occurs.

Unmanned Aerial Vehicle Corridors

Under the proposed action in Alternative A, the DEIS proposes to establish seven FAA approved Unmanned Aerial Vehicle (UAV) corridors. Alternative B would establish the same seven UAV corridors via a Certificate of Authorization granted by the FAA. These corridors would extend from Eielson Air Force Base and Allen Army Field at Fort Wainwright to various restricted air space areas. These corridors would be located in and near the second most heavily used airspace in Alaska. The civilian aviation community has expressed

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significant concerns about the designation of restricted air airspace for operation of UAVs in this area.

The Commission recommends the adoption of Alternative B as an interim measures until such time as the FAA complies with the provisions of Public Law 112-95 the *FAA Modernization and Reform Act of 2012*. Section 334, *Public Unmanned Aircraft Systems*, directs the Secretary of Transportation to issue “guidance regarding the operation of public (military and other government agency) unmanned aircraft systems to –

- (1) expedite the issuance of a certificate of authorization process;
- (2) provide for a collaborative process with public agencies to allow for an incremental expansion of access to the national airspace system as technology matures and the necessary safety analysis and data become available, and until standards are completed and technology issues are resolved;
- (3) facilitate the capability of public agencies to develop and use test ranges, subject to operating restrictions required by the Federal Aviation Administration, to test and operate unmanned aircraft systems; and
- (4) provide guidance on a public entity’s responsibility when operating an unmanned aircraft without a civil airworthiness certificate issued by the Administration.

(b) **STANDARDS FOR OPERATION AND CERTIFICATION.**—Not later than December 31, 2015, the Administrator shall develop and implement operational and certification requirements for the operation of public unmanned aircraft systems in the national airspace system.

Alternative B, designation of UAV corridors via a certificate of authorization, would still allow ALCOM to meet its mission and training requirements until such time as the Secretary of Transportation issues the necessary guidance and any necessary regulations for operating UAVs in the national airspace system. Under the provisions of Public Law, the Secretary should have already entered into an agreement with the military to simplify the process for issuing certificates of authorization. In addition, the certificate of authorization process should provide additional opportunities for public involvement before a final decision is made on designation of these corridors.

Subsistence

The Commission is concerned about the Impact Assessment Methodology used in the DEIS to assess the level of dependence on subsistence resources by communities potentially affected by the proposed Fox 3 MOA expansion and the proposed Paxson MOA. In section 3.1.13.3, Chistochina, Dot Lake and Gulkana are listed as having a high dependency and Cantwell, Gakona, Glennallen and Paxson are considered to have a medium dependency. Chickaloon is included in Table 3-24, but is assigned no ranking. We note that the 1982 harvest and use data for Chickaloon are also incorrect.

We find no basis for making different high dependency - medium dependency rankings for these communities when all pertinent factors are considered. All of these communities are on

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the road system and have similar access to alternative resources. In addition, for the eight communities listed in Table 3-24, an average of 97.25% of households participated in subsistence, with no community having less than 92.7% participation. For the seven communities for which information was available, residents harvested an average of 158 pounds of subsistence resources per capita. Harvest for Paxson, which is ranked as having a medium dependence, harvested 289 pounds per capita. This is more than the amount of per capita harvest for Dot Lake (115 pounds) and Gulkana (152 pounds). However, both of those communities were ranked by the DEIS as having a high dependence on subsistence.

A more realistic assessment of the subsistence harvest data for these communities would indicate that all of them have a high dependence on subsistence. As we did in our scoping comments, we point out that the preference for subsistence uses on Federal public lands in Alaska is provided to all rural residents, both Native and non-Native, under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Congress made that finding very clear in Section 801(4):

"in order to fulfill the policies and purposes of the Alaska Native Claims Settlement Act and as a matter of equity, it is necessary for the Congress to invoke its constitutional authority over Native affairs and its constitutional authority under the property clause and the commerce clause to protect and provide the opportunity for continued subsistence uses on the public lands by Native and non-Native rural residents;"

Ranking a community's dependency on subsistence resources on the basis of the percentage of Native or non-Native residents is inconsistent with both ANILCA Title VIII, as well as federal and state regulations. While it may be appropriate to rank an affected community's dependency, other criteria should be used. We suggest that the discussion in Section 3.1.13 and any discussion of statutory or regulatory provisions in Section B.13.2 be revised accordingly.

To avoid significant adverse impacts to hunting activities regulated under the State of Alaska's general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption of big game hunting in these areas during the peak seasons.

Fox 2 MOA and Eielson MOA

These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.

Realistic Live Ordnance Delivery Area

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Lt. General Steve Hoog
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The Commission is concerned about this proposal which would affect 163,230 acres of State owned land under Alternative A and 234,600 acres of State owned land under Alternative B. As the DEIS points out, this area is located within State Game Management Unit (GMU) 20A and is extensively used for moose hunting, with over 4,000 moose permits issued annually. More than 1,100 moose were harvested from GMU 20 A over the last several years. Also harvested are brown bear, black bear, and Dall sheep. Trapping also occurs throughout the entire area. More importantly, this is a priority use area by residents from the Fairbanks area. Any reduction in use would have significant impacts on area hunters and trappers. Should this proposal be adopted under either alternative, specific mitigation measures must be developed in consultation with the Alaska Department of Natural Resources and the Alaska Department of Fish and Game.

In addition, because this proposal would require action by the Alaska Department of Natural Resources to reclassify this area, the Commission will submit to the department any recommendations it may determine appropriate and to be within the scope of its responsibilities.

We again appreciate the opportunity to comment on this project. Please maintain our contact information for future notifications, and contact our office if there are questions about our comments. Thank you.

Sincerely,


Stan Leaphart
Executive Director

Cc: Governor Sean Parnell
Commissioner Dan Sullivan – ADNR
Commissioner Cora Campbell – ADF&G

G0027



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, Alaska 99506

Re: EPA comments on the Draft Environmental Impact Statement for the Alaskan Command's Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, EPA Project #10-066-DOD.

To Whom It May Concern:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Alaskan Command's (ALCOM) Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, Alaska (CEQ # 20120090). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

We appreciate ALCOM's effort to comprehensively evaluate all twelve actions (six projects and six programmatic actions) identified as appropriate for evaluation in the recently developed Joint Pacific Alaska Range Complex Master Plan. We believe this has added value to the consideration of cumulative impacts and provides for more complete disclosure of impacts for the decision maker as well as the public. However, we note that the complexity of multiple projects and actions without identification of preferred alternatives makes the review quite challenging.

Because preferred alternatives are not identified, and because the potential intensity of impacts varies greatly from alternative to alternative, we have rated the impacts associated each alternative individually. Please see the table below identifying our ratings and rating justification. Definitions of our ratings are attached.

Action	Rating	Justification
FOX 3 MOA Expansion and New Paxson Military Operating Area (MOA)	EO	Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety; adverse impacts to air quality, biological resources, access, subsistence and environmental justice.
Realistic Live Ordnance Delivery	EO	Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety.
Battle Area Complex Restricted Area	EC	Adverse impacts to aviation, noise receptors

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G0027

Expand Restricted Area R-2205	EC	Potentially moderate impacts to noise, air and land use, hazardous waste, and multiple socioeconomic resources
Night Joint Training	LO	No or minimal adverse impacts to resources
Unmanned Aerial Vehicle Access	EC	Potentially serious impacts to airspace use and aviation safety
Enhanced Ground Maneuver Space	EO	Potentially serious impacts to aquatic, physical, and biological resources
Tanana Flats Training Area Roadway Access	EO	Potentially serious impacts to aquatic, physical, and biological resources
Joint Air-Ground Integration Complex	EC	Potentially serious impacts to physical and biological resources
Intermediate Staging Bases	EC	Potentially serious impacts to physical and biological resources
Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska	LO	No or minimal adverse impacts to resources
Joint Precision Airdrop System Drop Zones	EC	Potentially serious impacts to socioeconomic resources

We have given the EIS an overall adequacy rating of “2” (Insufficient Information). Generally our impacts (alpha) rating is based on our concerns regarding potential impacts to water quality and aquatic habitats, noise receptors, air quality, subsistence, and other socioeconomic factors, such as safety and other adverse impacts to the private aviation community. Our adequacy rating is based on the concerns we have with the criteria used for the “subsistence community” analysis, additional information needed for direct and cumulative impacts analysis, and lack of use of monitoring data from previous projects (e.g. 1997 Alaska MOA EIS) to help inform this EIS.

We recognize the need for the transition to different training activities to fully meet the training and testing requirements for forces and activities in and near Alaska. We also recognize, however, that an increase and expansion of military training activities and areas will result in additional impacts to surrounding communities, users, and resources. We offer the following recommendations to avoid, minimize and mitigate adverse impacts.

Potential Impacts

We recommend that ALCOM continue to work closely with potentially impacted stakeholders (general and commercial aviation owners and groups, tribal governments, land owners, subsistence and sport hunting groups and resource managers) to identify ways to further avoid, minimize, and mitigate adverse impacts, particularly in the resource areas of aviation safety and subsistence. We also specifically recommend that ALCOM work closely with our agency, as well as the Alaska Department of Conservation, to further minimize potential impacts to physical and biological resources from air emissions and noise, the generation of hazardous wastes, and discharges into waters of the U.S.

Discharges and Hazardous Wastes

We are particularly concerned about possible discharge of live munitions into aquatic environments. Depending on the constituents of the munitions, adverse and potentially lethal impacts, such as those

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seen at Joint Base Elmendorf-Richardson Eagle River Flats, could occur. We recommend that for required live firing training, every effort be made to discharge munitions that do not contain white phosphorus or other constituents that could cause increased mortality in waterfowl similar to what was occurring at Eagle River Flats. Wastewater discharges associated with construction stormwater are included in the discussions of several proposed actions. There does not appear to be discussion of the discharge of munitions, which are also regulated under the National Pollutant Discharge Elimination System. This permit program is scheduled to be transferred from the EPA to the State of Alaska on October 31, 2012, as part of the Phase IV transfer of the Alaska Pollutant Discharge Elimination System. For more information about program transfer, please see the Alaska Pollutant Discharge Elimination System website at <http://dec.alaska.gov/water/APDES/phaseIVextension.html>.

We also recommend that the final EIS include, as applicable, a discussion of Spill Prevention, Control and Countermeasure Plans and Facility Response Plans, as required by the Clean Water Act and the Oil Pollution Act of 1990. Finally, we recommend that the final EIS provide detailed information regarding the anticipated types of hazardous wastes that will be generated as part of the proposed action, how the wastes will be managed, and the plans for disposal in accordance with federal, state and local requirements. The EPA regulates hazardous wastes under Subtitle C of the Resource Conservation and Recovery Act.

Subsistence

To address impacts to subsistence, we recommend further coordination with the Alaska Department of Fish and Game Subsistence Division and Board of Fisheries as well as Federal Subsistence Board to determine if additional measures (such as timing windows, higher minimum altitude) would substantially reduce the potential impacts identified in the EIS, particularly from FOX 3 MOA Expansion, New Paxson MOA and Realistic Live Ordnance Delivery proposed actions.

Aviation

To address the potentially serious impacts to aviation and aviation safety, we encourage you to continue working with commercial and general aviation groups as well as individual owners and operators, and the Airports Divisions within ADOT and FAA to determine if additional avoidance, minimization, or mitigation measures can further reduce impacts, particularly to aviation safety. As identified in the EIS, general and small commercial aviation are critical modes of transportation for communities in rural Alaska, including those identified in the project area. For residents in these communities and in more remote locations, effective communication regarding training activities is often difficult. If information regarding the occurrence and scheduling of such activities is not received by the private operators, or is not timely, safety can be seriously compromised. Therefore, we recommend that work be done to ensure the current effectiveness of the existing Special Use Airspace Information Service that is currently used to inform civilian pilots when MOA and restricted areas are activated. If this information is currently available it should be included in the final EIS. If it is not, we recommend that a study be undertaken to determine its effectiveness. If deficiencies are identified, we recommend that improvements be implemented, preferably before the signing of the Record of Decision.

Cumulative Effects

We recommend that coordination with the Federal Energy Regulatory Commission occur to ensure that the most current proposed activities associated with the Susitna-Watana Hydroelectric Project are considered in the cumulative impacts analysis in the final EIS.

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Adequacy

To improve readability, we recommend a detailed table outlining alternatives for each proposed action and a detailed discussion regarding each alternative by resource. We recognize that such a table with “averaged” impacts is currently included in the Executive Summary, but it is important that the EIS present the “sharp contrast” between alternatives. While the narrative in the effects section does this to a certain extent, a detailed table would be helpful to readers to visually present the information.

We also expect that the final EIS will contain much greater detail regarding aspects such as the locations of facilities, access roads, numbers of aircraft, and estimated acres of impact, as well as discussion of the potential impacts associated with proposed structures and project activities. We are particularly interested in the quality, acreage and functions of waters of the U.S. that will be impacted by the discharge of dredged or fill material, and wastewater discharges. We request that for specific proposals where it is appropriate or feasible, a draft Clean Water Act 404(b)(1) analysis be drafted and included as an appendix to the final EIS. By including this analysis for project-specific EISs, permitting decisions under Section 404 can be coordinated with other agency decisions, including the consideration of whether the proposed discharge would represent the least environmentally damaging practicable alternative.

Currently the criteria being used for the subsistence community analysis appears to be based on an arbitrary racial composition, and it seems to discount the common practice of rural Alaskan residents to rely on subsistence resources. Other factors that contribute to this reliance are proximity to food stores and U.S. Post Offices. We recommend that these additional components be considered for the subsistence analysis in the final EIS. If the final EIS relies on the current criteria, we recommend that the document include a discussion of the basis for these criteria.

Mitigation and Monitoring

We appreciate the inclusion of Appendix K, Mitigations, Best Management Practices, and Standard Operating Procedures. We request that the final EIS include avoidance and mitigation measures (e.g. restrictions to avoid lambing, buffers along Wild and Scenic corridors) identified by the Bureau of Land Management, Alaska Department of Fish and Game, and other agencies responsible for the protection and conservation of public resources in previous and more recent correspondence in response to scoping and review of the draft EIS.

We also recommend that additional information be included in the final EIS to clearly distinguish between those mitigation measures that ALCOM has the authority to implement, and those which it cannot and thus, would require the involvement of other agencies to execute them. We believe this information would be consistent with CEQ's Guidance, *Appropriate Use of Mitigation and Monitoring and Appropriate Use of Findings of No Significant Impact*, issued in January 2011 (http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf). Finally, and also in line with the mitigation guidance, we recommend that a draft adaptive management plan be identified and included in the final EIS to monitor and ensure the success of future mitigation efforts.

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Again, we appreciate the opportunity to offer comments on the draft EIS and look forward to working with ALCOM on addressing the issues we have identified for the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov, with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure

G0027

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

G0028

[REDACTED]

From: Terry Mudd [REDACTED]
Sent: Thursday, July 12, 2012 1:54 PM
To: ALCOM J08 Admin Box
Subject: Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA

Please "Take No Action" and leave the MOA "as is". Flying in Alaska is hard enough with the unpredictable weather, mountains and an abundance of MOA and restricted areas.

Respectfully
Terry Asbury
Denali Borough Assembly member

N.2.2 Tribal Comments in Order by Identifier ID Number

T0001



Chickaloon Village
Traditional Council
(Nay'dini'aa Na')

May 21, 2012

Gary Harrison,
Traditional Chief

Doug Wade,
Chairman/Elder

Rick Harrison,
Vice-Chairman

Penny Westing,
Secretary/Elder

Albert Harrison,
Treasurer/Elder

Jess Lauman,
Elder Member

Burt Shaginoff,
Elder Member

Larry Wade,
Elder Member

Shawna Larson,
Member

Jennifer Harrison,
Executive Director

Dr. Jerome Montague
Native Affairs Advisor
Headquarters Alaskan Command (ALCOM)
Joint Base Elmendorf-Richardson Alaska
9480 Pease Avenue, Suite 110
Joint Base Elmendorf-Richardson, AK 99506-2101


Dear Dr. Jerome Montague,

I am writing this letter to you in order to continue the open communication that we established when we previously met in your office in February 2011. Our Tribal citizens have recently expressed concerns about the US Air Force's airplanes in our area and we have several questions:

- What are the Air Force's lateral boundaries along the river valleys? If your limit is 5,000 feet from ground level, how close are you allowed to be next to a mountain when you are flying in a valley?
- Is the Air Force allowed to fly lower than 5,000 feet if you are flying at a slower speed?
- Is the Air Force currently flying or are you planning to fly unmanned aircraft in the Matanuska Watershed area?

I look forward to your response. If you have any questions or need clarification, you can call me at 907-745-0749. I look forward to working with you.

May Creator Guide Our Footsteps,


Doug Wade
Chairman

P. O. BOX 1105 Chickaloon, Alaska 99674
e-mail: cwadmin@chickaloon.org

Phone (907) 745-6707 Fax (907) 745-0709
Home Page: <http://www.chickaloon.org>

T0002



KNIK TRIBAL COUNCIL

KNIK, THE OLDEST VILLAGE IN COOK INLET

En.
SP

To JJ



July 9, 2012

LT. GEN. STEPHEN L HOOG
Commander, Alaskan Command
9480 Pease Ave., Ste. 110
Joint Base Elmendorf Richardson, AK 99501-2101

RE: Joint Pacific Alaska Range Complex – Draft EIS

Dear Lt. Gen. Hoog:

Department of Defense Instruction No. 4710.02, and Executive Order 13175 provides for a protocol and process for meetings and consultation on the development of policies that have implications upon tribes. The Knik Tribal Council formally requests government to government consultations in addressing the tribe’s concerns and interests regarding the proposed military operational area expansion to the Joint Pacific Alaska Range Complex.

The Knik Tribal Council has specific concern with the effect of the proposed undertaking upon the tribe’s cultural and subsistence resources within the Fox 3 MOA, the Fox 3 MOA Expansion, and the Paxson MOA. The tribe cannot support the proposed expansion without first having the opportunity to participate directly in determining the extent of the project’s impact upon the tribe, its lands and the resources that it depends upon. The wildlife in the proposed areas is of significant importance to the tribe and it is our contention that increased military training exercises would impact the migration, production and continued sustainability of the tribe’s wildlife resources in these areas.

We are asking to be directly involved in mitigation efforts involving the monitoring of impact to wildlife and how the tribe can participate, both in gathering and collecting the data and information; and in developing the conclusions and findings on the implications to the tribe.

Please work with Richard Porter, Knik Tribal Council Executive Director in implementing our request. His contact information is below.

Sincerely,

Debra Call
President

P.O. BOX 871565 (907) 373-7391 FAX: (907) 373-2161 E-MAIL: RPORTER@KNIKTRIBE.ORG
WASILLA, AK 99687 (907) 373-7993

N.2.3 Non-government Comments in Order by Identifier ID Number

N0001

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0001	Carl Sieber	Vice Chairman	Alaskan Aviation Safety Foundation	NEPA Process	<p>The Alaskan Aviation Safety Foundation (AASF) respectfully requests an extension of the comment period for submitting comments on the Draft Environmental Impact Statement (DEIS) on the Joint Pacific Alaska Range Complex public noticed on March 30, 2012. We request a total comment period of 120 days from the date of the public notice. The National Environmental Policy Act (NEPA) sets forth specific guidelines and requirements for preparing environmental documents and setting time lines for the public to respond. 40 CFR (§) 1502.7 suggests a final EIS should consist of 150 pages, and proposals of unusual scope or complexity shall normally be less than 300 pages. We expect that this draft document is approximately the same length as we should anticipate for the final. The page count is defined in §1502.10. My computer tells me the JPARC DEIS is 655 pages for the pages meeting the definition in §1502.10 d through g. We also note that the total document including appendices is 1,394 pages. §1506.10 (c) says that the comment period should be not less than 45 days on draft statements, and can be extended to accommodate public comments. The AASF feels that a short extension to 120 days total is reasonable and will not adversely affect the USAF decision making process or schedule. The AASF has tried to assemble comments before the published June 7, 2012 deadline, but find that our volunteers will not be able to meet that deadline. We therefore find it necessary to request a further extension in order to provide meaningful comments. USAF staffs have already publicly acknowledged that this is a complex document, and our volunteers can concur. The Congress of Environmental Quality (CEQ) has offered informal guidance that agencies should offer the public every opportunity to provide comments in order to help agencies such as the USAF to make better decisions. The AASF sincerely hopes that the USAF decision makers concur. Thank you for your consideration, and we look forward to your favorable response.</p>

N0002

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■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]

3 MR. RAZO: Good evening. My name is Gregory Razo. I work
4 as a Vice President at Cook Inlet Region, Incorporated. Our
5 company calls itself CIRI. We are the regional Alaska Native
6 corporation for Southcentral Alaska headquartered here in
7 Anchorage. We also are delegated the tribal authority for the
8 Anchorage region.

9 In general our company has had an opportunity to review
10 the Joint Pacific Alaska Range Complex proposal and Draft EIS.
11 We believe that the Joint Pacific Alaska Range Complex allows
12 for unprecedented training opportunities for our war fighters
13 that are not found in any other region of the United States and
14 we encourage the development of the JPARC process.

15 We think that in terms of the work done to date with
16 regard to the six definitive proposals they have adequately
17 addressed the specificity, dependence, definition and ripeness
18 requirements of the EIS and in particular with regard to the
19 programmatic proposals we strongly support programmatic proposal
20 eight, nine and 10 which deal with the proposed Tanana Flats
21 training area roadway access, the proposed joint air ground
22 integration complex and the proposed intermediate staging bases.

23 In reviewing the anticipated environmental impacts from
24 the JPARC proposal we are happy to see that there is determined
25 to be little impact on the subsistence uses of the affected

[REDACTED]

N0002

45

1 areas. Subsistence is very important to the Alaska Native
2 people and the ability to access those resources which have been
3 the resources of our people for thousands of years should be
4 maintained and not impacted by the JPARC proposal.

5 Additionally, I think that with regard to the socio and
6 economic impacts of the JPARC proposal that the Department of
7 Defense should also consider not just the adverse impacts, but
8 the substantial positive impacts that development of
9 particularly the programmatic proposals that I mentioned
10 previously will have for job opportunity and training and
11 workforce development, particularly for our Alaska Native
12 people. Those regions that are going to be affected by the
13 JPARC development are areas of high unemployment where there is
14 little opportunity for work and the work that would be
15 associated with this proposal would be good work for our people.

16 For all of those reasons Cook Inlet Region, Incorporated,
17 supports this Draft EIS. Thank you.

18 UNIDENTIFIED MALE: Thank you.

19 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

N0003

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Kern Aiton Date: 5/18/12
Title: Legislative Liaison / Member
Organization: Delta Sportsman's Assn / ADEdg Advisory Committee
Is this a government agency (choose one): yes no
Comment submitted on behalf of (choose one):
 your organization/business/agency

[Redacted Address]

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
- Cumulative Impacts
- Mitigations

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

*Paxson
MOA Addition*

Proposed Actions:

- All proposed actions
- 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA
- 2 - Realistic Live Ordnance Delivery
- 3 - Battle Area Complex Restricted Area Addition
- 4 - Expansion of R-2205 Restricted Area
- 5 - Night Joint Training
- 6 - Unmanned Aerial Vehicle Access
- 7 - Enhanced Access to Ground Maneuver Space Areas
- 8 - Tanana Flats Training Area Access Road
- 9 - Joint Air-Ground Integration Complex
- 10 - Intermediate Staging Bases
- 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
- 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

N0003

Comment(s):

Facts: I am a combat veteran that understands and appreciates the need for enhanced military training -

A half century ago, the military displaced us ~~benignly~~ from the Mt Hayes Blair Lakes Game Refuge to create a bombing range.

I have experienced near-miss situations with A-10s in Towa Ridge Area -

Five 3
500 AGL
Paxon
MOA
500 AGL

~~that~~

To create a 500 AGL flight zone, especially in the Paxon MOA, with aircraft much faster than A-10s will be extremely hazardous for local pilot citizens, especially in September.

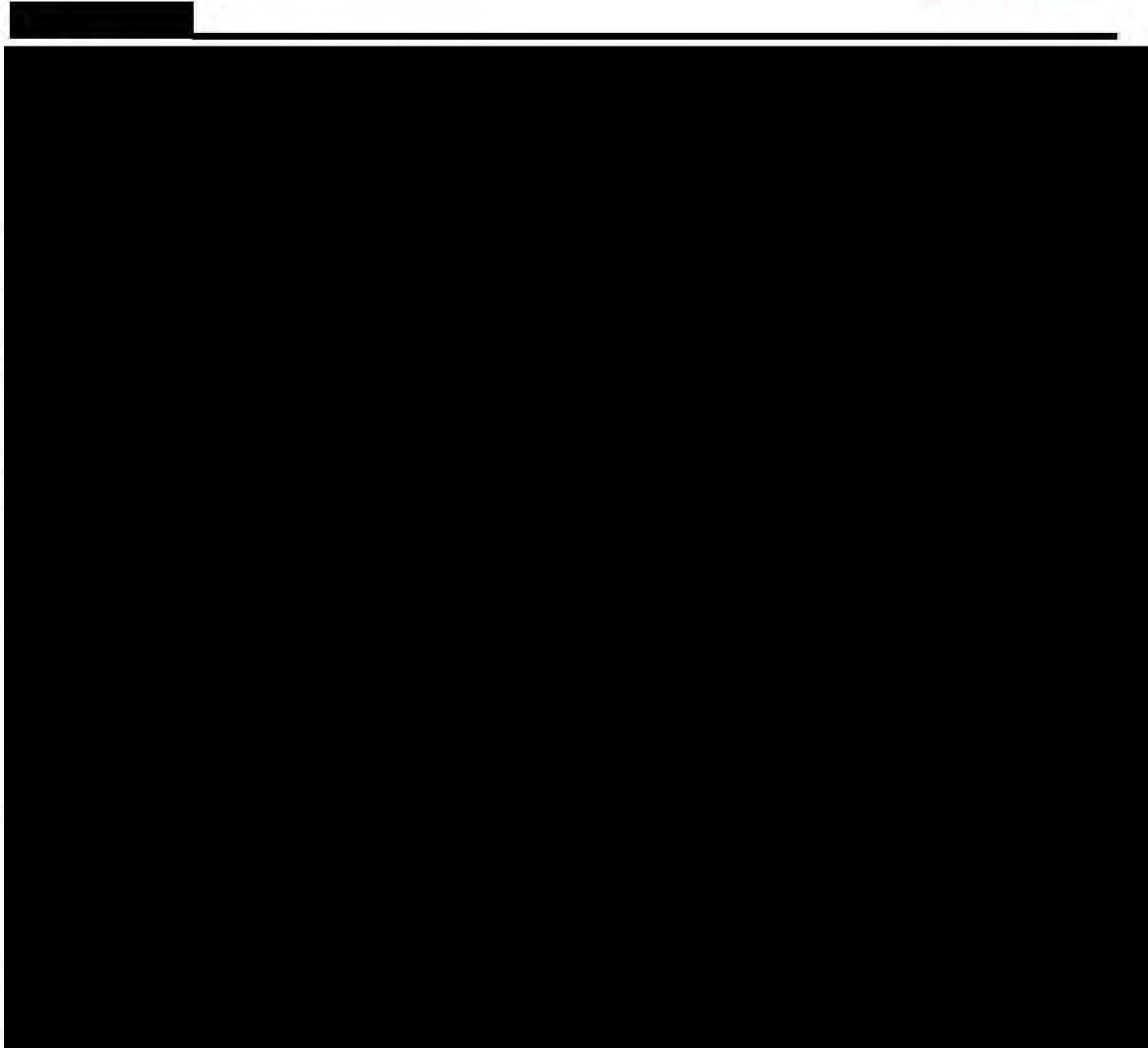
large waterfowl flocks are also an extreme hazard near Delta & Delta/Tanana Rivers -

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

N0004



From: Martin, Melissa [REDACTED]
Sent: Wednesday, May 23, 2012 4:59 PM
To: Tarver, Jason E.; Pearson, Karen M.
Subject: JPARCEIS Website Support

To Whom It May Concern,

My name is Melissa Martin, I work in the Air Traffic Division at Aircraft Owners and Pilots Association. I am looking to submit comments on the website, I see that there is an area for written form comments but not a way to attach a document. I have gone ahead and attached AOPAs comments to this email, please provide me with confirmation that it was received/ passed along to the correct person who can address our concerns. If there is another way to attach a document via the website please let me know. Thank you.

N0004



www.aopa.org

May 23, 2012

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex

To Whom It May Concern,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period.

Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National Environmental Policy Act (NEPA).

AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed actions. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings.

AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams".

Heidi J. Williams
Vice President
Air Traffic Services and Modernization

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

N0005

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0005	John Delaquito	Owner	Lake Louise Lodge	Description of Proposed Actions and Alternatives (DOPAA), Airspace Management, Noise, Safety (Airspace), Safety (Ground), Physical Resources, HAZMAT, Subsistence, Air Quality, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I oppose the use of the Fox 3 MOA area for a number of reasons which include the following: 1) The area being requested for the Fox 3 is used by a very large amount of people for fishing and hunting recreation, birdwatching, and residents like myself who live in this area on a full-time basis. 2) This area is easily accessible by people that reside all over the state but many live in close proximity to Anchorage and the Matanuska Valley. It is a popular area for private pilots and small commercial pilots/guides and question the necessity of the additional air space that is being requested. 3) The necessity of the additional area is questioned and it is in fact really needed for training area. The Lake Louise tri-lake area is the largest lake system in Alaska which you can drive to and should be preserved for a recreational location for all residents of the state to enjoy. It would make sense to use a more remote area for this training. Thank you for your consideration in not expanding the air space area. In summary, for the preservation of our tranquil environment, wildlife, and enjoyment of our homes, please do not expand this area for your training.

N0006

[REDACTED]

19 MR. PARMENTER: David Parmenter. I operate Copper Valley
20 Air Service here in the basin. Again, the other air taxis
21 around here aren't here so I'm kind of speaking for them. But
22 the MOA low level, we have limited time in the Basin. We got
23 tremendous winter months. We don't see why there should be low
24 level essentially say from the month of June -- or month of May
25 through October when all the revenue is being developed in that

[REDACTED]

N0006

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1 four months.

2 The expand or have a boundary say from the Denali Highway
3 north, Talkeetna, Richardson Highway, use that -- don't use that
4 in the month -- for four or five months out of the year and
5 maintain at least 5,000 feet above with your original MOA. We
6 just don't need the conflict with our revenue, tourism, three
7 major holidays and hunting season. And I do a tremendous amount
8 of flying in the Basin in that time and that's just one more
9 thing I got to watch out for. That's one of our main concerns.

10 But we got a tremendous amount of land here and, again, I
11 don't think we should be whipping around here over the top of
12 everybody's houses, homes, cabins. Call it what you like, but
13 essentially it's going to disrupt a tremendous amount of
14 revenue. Thanks.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

N0007



1 As I said, I haven't looked deeply into the EIS, but where
2 I have it seems to me to be quite inadequate in spite of its
3 great length. I have the impression that the writers simply had
4 a lack of knowledge of this area and its resources. Probably it
5 was written by those who don't live here in the Basin and if
6 they are living in Alaska haven't been here for a long time and
7 probably won't be here for a long time. I -- we are used to
8 seeing environment impact statements that are written by people
9 who live and work here and they're very different.

10 I want to make an example of the cumulative impact area.
11 With regard to cumulative impacts, I haven't found any mention
12 of the Susitna Dam which would greatly affect this area and our
13 biological resources or recreation. No mention of the mineral
14 exploration and possible development around Tangle Lakes. No
15 mention of biomass harvest, climate change. I did find
16 cumulative impacts regarding the oil pipeline and the gas
17 pipeline, but not with respect to the biological resources, only
18 with respect to some of the other resources.

19 With respect to biological resources, there is a very
20 short paragraph on cumulative impacts with other non-military
21 actions. In other words, how does this proposal relate to
22 things that are going on that are non-military in terms of
23 effects on us. No substantive non-military actions have been
24 identified for the areas under the proposed expanded Fox 3 or
25 Paxson MOAs. Therefore, contributions of non-military actions



N0007



1 to cumulative impact effects in the Fox 3 Paxson MOA proposal
2 area would be insignificant. Now that's in the biological
3 resources section for cumulative impacts. I just am quite
4 amazed at that statement. Caution.

5 Biological resources, recreation and subsistence all
6 intermesh. Biological resources are essential to subsistence
7 and to almost all recreation and I think that recognition is
8 lacking in this EIS and it makes for a very confusing document.
9 Thank you for your time and for making this opportunity
10 available.

█ [REDACTED]

█ [REDACTED]

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N0008

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

4 MR. MARTINEK: Yeah, my name is Gary Martinek, M-A-R-T-I-
5 N-E-K. I'm the hatchery manager at Gulkana hatchery, a State
6 facility started in 1973. This is the largest sockeye facility
7 in the world. It's three miles north of Paxson Lodge on a
8 series of springs. The salmon that we provide are basically
9 used for commercial fishing, subsistence, personal use and sport
10 fishery. The upper Copper River is the source of one of the
11 most valuable sockeye and king salmon resources in the state.
12 Besides the hatchery springs, there are over 10 different wild
13 sockeye stocks and at least six different stocks of wild king
14 salmon and the most northern stock of wild rainbows in the
15 United States. Like Luke Catledge mentioned, our single biggest
16 concern is during this window of incubation which is roughly --
17 can be 120 days. These eggs are extremely susceptible to any
18 type of noise or shock and can be killed with just a simple
19 sound of a gunfire in an incubator. And we definitely would
20 like you to relook at this situation. I mean this is a very,
21 very valuable resource to not just people in the state of
22 Alaska, but people world wide. So thank you.

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

[REDACTED]

N0009

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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█ [REDACTED]

8 MR. CATLEDGE: Thank you. My name is Lucas Catledge, C-A-
9 T-L-E-D-G-E. I work with the Gulkana hatchery here locally and
10 my main concern is probably the sonic booms. And working at the
11 salmon hatchery here in the fall especially when we have eggs
12 loaded in the incubators I see that as a potential threat to the
13 safety of the eggs. They're very susceptible to shock and even
14 at the 5,000 foot a sonic boom will rattle and shake things here
15 on the ground. And fortunately we haven't seen any substantial
16 loss in the past, but I see here on the scheduling for their red
17 flag training exercises that this year's proposed to be August
18 -- or scheduled to be in August and again in October. And that
19 first date, August 6th through the 17th, is when we're first
20 loading eggs into the incubators and they're very fragile until
21 they eye up. That's about two months in time. And so that
22 would extend -- and our main egg take extends into the first
23 part of October often and so the eggs are a very fragile state
24 at the -- at that point. And so like I said, even at 5,000 feet
25 a sonic boom directly over the canyon would be detrimental.

[REDACTED]

N0010

[REDACTED]

25 MR. PETERSON: My name is Tony Peterson, P-E-T-E-R-S-O-N.

[REDACTED]

N0010

1 I represent Paxson Lodge. I'm also the President of the
2 Community of Paxson. My concerns mostly are the effect on
3 tourism along with this lodge being as old as it is the sonic
4 booms, the possibility of blowing out windows and guests being
5 in the rooms. If a window was to shatter the impact on that
6 guest as well. These are single pane windows. This lodge is
7 old. It's been here forever. It's been in this area since
8 1904, this lodge has been here since 1946.

9 The hatchery is also a concern. The hatchery provides the
10 salmon not only for this area, but like Gary said, for the
11 entire northeast mar -- or northwest market and around the world
12 actually.

13 The drop in altitude to 500 feet above ground level will
14 also impact the hunting for this area as far as I am concerned
15 and it will also impact the industry that we have where we have
16 people coming to stay here and stay at this lodge and in this
17 area and provide business to not only myself but to Myers (ph)
18 Lake and to Mr. Bakewell's Denali Cabins. This area -- I am --
19 I'm for the military training and having the ability to train
20 and to provide these maneuver -- or to do these maneuvers, but I
21 do not believe that the Paxson area is an area that is
22 susceptible to these maneuvers. There's plenty of area to the
23 north. Expand the Yukon River. Yukon River there is little to
24 no inhabitants. I understand that you need the geographical
25 with the mountains and that for your training, but Pax -- the



N0010

1 area of Paxson and the Gulkana River I do not believe are your
2 best points of interest, they need to be moved. Even if you go
3 north beyond the Paxson area between Fielding (ph) Lake and the
4 Donnelly (ph) area. That would be even -- that'd be very well
5 acceptable for me. Thank you very much.

[Redacted text block containing approximately 25 lines of blacked-out content]

[Redacted signature block]

N0011

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11 MR. SCHANDELMEIER: John Schandelmeier, S-C-H-A-N-D-E-L-M-
12 E-I-E-R. I'm chair of the.....

13 UNIDENTIFIED MALE: You need to.....

14 MR. SCHANDELMEIER: Did you get it? You didn't get it?

15 UNIDENTIFIED MALE: (Indiscernible).

16 MR. SCHANDELMEIER: S-C-H-A-N-D-E-L-M-E-I-E-R. I'm a
17 Paxson resident, also a resident McClaron (ph) River, Chair of
18 the Paxson Fish and Game Advisory Committee. And my comments
19 are kind of based on this same thing everybody else is here.
20 It's -- low level training is a negative impact for this area,
21 the whole Nelchina Basin actually. It's the highest use
22 recreational area in the interior of Alaska or one of the
23 highest in southcentral I guess it would be if you want to call
24 it southcentral instead of interior. Seems like could have
25 picked a better area, a lot less impact, lot less controversy.

[REDACTED]

N0011

■

1 The solution I have if you're stuck on this area is no fly
2 zones, 10 mile radius around Paxson, Tangle Lakes, McClaron (ph)
3 River, wherever else is a concern, wherever there's people. If
4 you have the no fly areas around those it seems like that solves
5 a lot of problems as long as you can keep people out of those
6 areas. And that seems to be a concern because right now
7 Paxson's supposed to have aircraft at 18,000 feet and no lower.
8 We certainly do. We have their right on the deck at times. So
9 like to see that -- some -- the way to monitor that, again, is a
10 no fly zone at all, you don't have to worry about it, their
11 altitude. So that's the solution that I see and other than
12 moving the whole MOA out of here and putting it somewhere else
13 where there's less people that's it. Thank you.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

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[REDACTED]

N0012

[REDACTED]

15 MR. PETERSON: Tony Peterson, P-E-T-E-R-S-O-N. Again, I'd
16 like to enforce that I do support the training of our military,
17 but this area -- John Schandelmeier made a great point with a no
18 fly zone for a 10 mile radius. However, the entire Gulkana (ph)
19 River, Gakona (ph), Gulkana (ph), the entire system that is
20 supported not only by the hatchery but the wild sockeye and, as
21 they said, that they are so fragile for that 120 days out of the
22 year even in the wild stock. That loss would be a magnitude
23 that I could pretty much assume would be unimaginable. It would
24 devastate the commercial fishing, it would devastate the
25 personal fishing and it would devastate the subsistence fishing

[REDACTED]

N0013

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

5 MR. PETERSON: Tony Peterson. As to the expansion area of
6 MOA 3 Paxson the suggestion would be to put a three mile
7 corridor to the east of the Gakona (ph), Gulkana (ph) River and
8 three miles west of the....

9 UNIDENTIFIED MALE: Now (indiscernible) rivers. They all
10 start (indiscernible).

11 MR. PETERSON: Gakona, Gulkana. And three miles to the
12 east as well with a ceiling of 10,000 feet -- this area would be
13 open to 10,000 feet and above for exercises. The way to
14 designate this as a no fly zone is to put this as a kill zone
15 during activity. If they drop below 10,000 feet in this area,
16 in this no fly zone, then they would be essentially terminated
17 as far as the exercise goes.

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
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■ [REDACTED]

[REDACTED]

N0014

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0014	John Schandelmeier	Chair	Paxson Fish and Game Advisory	Cumulative Impacts, Cultural Resources, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	Paxson Fish and Game Advisory Committee strongly opposes the new proposed Paxson MOA. Sonic booms will adversely affect the largest Sockeye salmon hatchery in the world in time periods when they are the most vulnerable. We urge that a 20 mile wide corridor be implemented where there is no air traffic what-so-ever. 10 miles either side of the Richardson Highway. Frequent violations of current MOA's have convinced us that the Air Force is either unable, or unwilling to monitor it's own activities. We also ask for the same restrictions along the Denali Highway corridor. thank you, John Schandelmeier, chair

N0015

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■ [REDACTED]

■ [REDACTED]

13 MR. MULFORD: My name is Robert Mulford, M-U-L-F-O-R-D.
14 I'm a local organizer for Veterans for Peace. In the counsels
15 of government we must guard against the acquisition of
16 unwarranted influence, whether sought or unsought by the
17 military industrial complex. The potential for the disastrous
18 rise of misplaced power exists and will persist. We must never
19 let the weight of combination endanger our liberties and
20 democratic processes. We should take nothing for granted. Only
21 alert and knowledgeable citizenry can compel the proper
22 messaging of the huge industrial military machinery of defense
23 with our peaceful methods and goals so that security and liberty
24 may prosper together. President Dwight David Eisenhower in his
25 farewell address to the nation, January 17th, 1961.

[REDACTED]

N0015

1 I appreciate the courage of you men in uniform. I wore
2 the uniform myself. I was never in combat, but I appreciate
3 your courage. I understand -- I do understand your courage, but
4 I want to speak real briefly about the courage of another man
5 and another type of courage. Three weeks ago I attended a pre
6 court-martial hearing of a young PFC who exhibited a different
7 kind of courage. I only hope that down the road if you men
8 realize -- come to realize that the misplaced power, the
9 disastrous rise of misplaced power is not only a potential, but
10 it exists in these technologies and these policies that are
11 based on these technologies. That you find the courage within
12 yourself to do much the same thing that that brave young PFC,
13 Private Bradley Manning (ph), did and help save this country
14 from this disastrous rise of misplaced power. Thank you.

█ [REDACTED]

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N0016



10 MR. MCGREGOR: Oh, okay. Dan McGregor, M-C-G-R-E-G-O-R.
11 As we reported, with Denali Air. Primarily focusing concerns on
12 areas basically out the Nenana River Valley and glaciers
13 surrounding the Mount Devera (ph) area. There are right now two
14 main operators that spend a lot of time, but there's more,
15 Atkins Flying Service in different areas, different companies
16 that fly out there with regular routine flights out that area
17 doing landings, being on the glaciers. The concern was low
18 level traffic in that area affecting that commercial status and
19 the ability to make money and of course safety concerns with
20 fast movers and very slow movers, being us, on wheel skis and
21 different things. So I just wanted to mostly go on record that
22 that was brought up in concern.

23 A lot of the areas focus more under the Fox 1 MOA, which
24 is not going to be an issue as long as that surface ceiling goes
25 down to -- or stays above 5,000 AGL. Any change to that in the



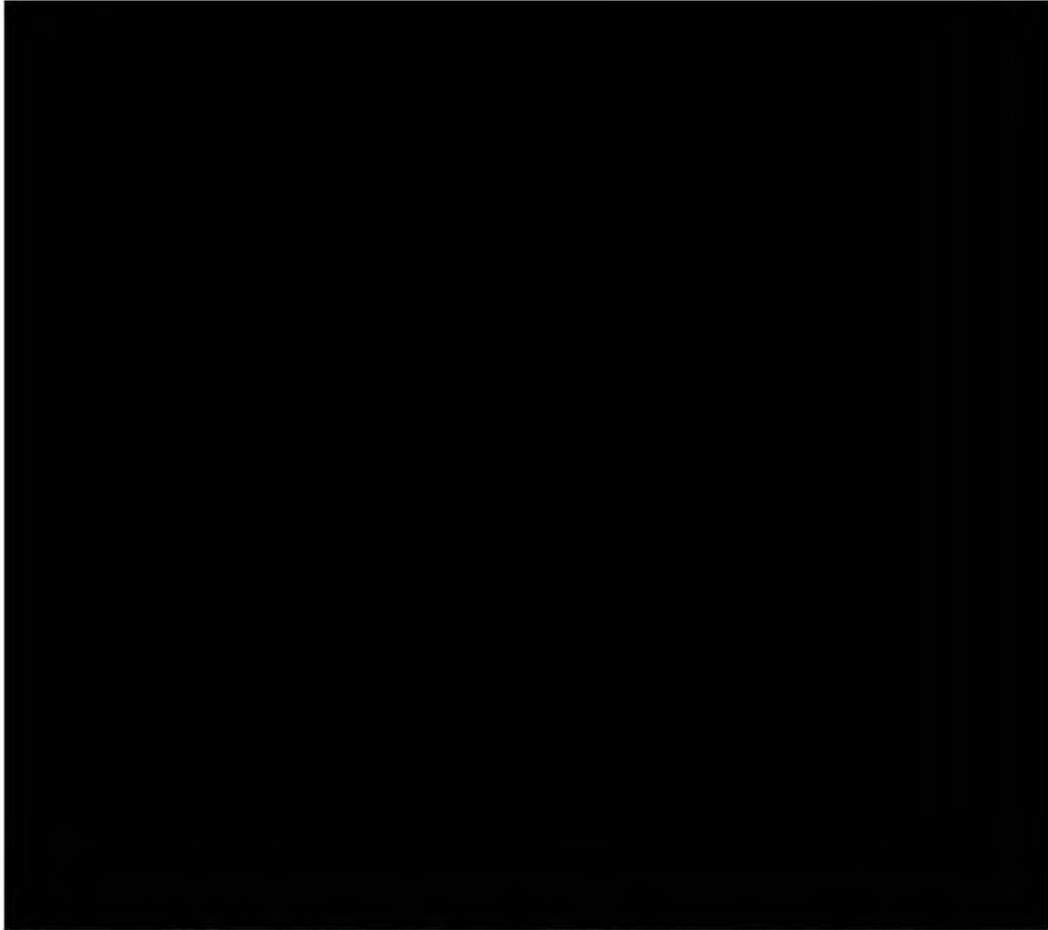
N0016

1 Fox 3, that 500 feet. I understand the need for training at
2 that low level and that's of value. It's a drastic change and
3 that's one of the things that concerns us I guess is the severe
4 change in that from 5,000 down to 500. Most of the glaciers
5 that we are flying into are going to be out of that realm, but
6 there are some and there's transit areas where we cross that --
7 through that. It's very difficult without being able to get in
8 contact and alert the MOAs. I think radio repeater -- as I
9 understand it, the radio repeater or the alert systems through
10 the radio traffic is not quite operational yet and the funding
11 is in place, but those aren't at full capacity yet I guess for
12 us to be able to update or get updates on any MOA traffic while
13 we're in the air as far as I understood and I can find out more
14 on that later.

15 But in general I just wanted to have it known that there
16 is commercial traffic out there. We do fly out there regularly
17 and if that is taken into account that would be a good thing to
18 have noted. That's it.



N0017



19 COLONEL WEISS: Thank you very much. Mr. Adam White.

20 MR. WHITE: Thank you. Name is Adam White serving as the
21 President of the Alaska Airmen's Association, last name spelled
22 W-H-I-T-E. First of all, I want to thank the military for your
23 efforts in educating the public. I've learned an awful lot
24 about the way our government operates and this whole NEPA
25 process. Appreciate your patience as you have been educating me



N0017

1 and a lot of our constituents and members and thank you for your
2 efforts and your time for that.

3 A couple of areas that I wanted to comment on tonight.
4 We, especially here north of the Alaska Range, have really
5 appreciated and enjoyed the safety and the peace of mind of
6 having access to the SUAIS Service, the Special Use Airspace
7 Information Service. That has been a tremendous help in us
8 transiting the area that you guys use for your operations. It
9 has helped de-conflict our passage through that area and from
10 what I hear from your direction back towards us you appreciate
11 having the knowledge where we are and when we're going to
12 transit that area.

13 I would like to encourage you to expand that system, and I
14 know that's been talked about, but especially with the proposal
15 for the Fox MOA expansion and the Paxson MOA. The most coverage
16 we could have down there the better and it would -- from our
17 perspective if the coverage is not there or if a certain
18 repeater may be out of service consider mitigations for not
19 using the lower level, lower strata of that airspace when the
20 communications may not be available for any given time. Because
21 we've had such great success with that service we would like to
22 see it implemented actually nationwide to be honest with you.
23 And we know that there's a couple of other areas in the U.S.
24 where they have similar type systems, but knowing the success
25 that we've had here we especially want it implemented statewide


N0017

1 and especially in these lower altitudes where the potential for
2 conflicts exist.

3 One of the things, that as the Airmen's Association we try
4 to make sure that we're up to speed and aware of what's going on
5 not just with this particular procedure and policy change, but
6 with other areas that the military's acting as well as how that
7 interacts with the FAA. And it's not an easy task, but some of
8 the things that we've talked about previously, the moving of the
9 F-16s from Eielson down to JBER and how that might affect some
10 of your proposals and want to make sure that that's at least
11 considered or talked about during some of these areas.

12 Looking at my notes here. As we brought up earlier, with
13 the UAV corridors and the lack of definition from the FAA about
14 your ability to operate these vehicles in the national airspace
15 system, want to make sure that if your proposal for the
16 realistic live ordinance does include connecting R-2211 and R-
17 2202 that you would not be limited to using that airspace for
18 what it was specifically requested for. But since that airspace
19 would potentially be there it would be better to be able to use
20 it for multiple uses, including the UAVs.

21 Question that we also have that -- not sure that it's been
22 dealt with sufficiently is the use of Fort Greely and class
23 delta airspace there with the potential for traffic to possibly
24 decline in that area and the potential for that no longer being
25 a full-time type operations, what would that do for some of the



N0017

1 transit areas through that area as far as general aviation and
2 civilian traffic. One of the things that has been brought up
3 numerous times by our members.....

4 COLONEL WEISS: Sir, you've.....

5 MR. WHITE: Okay.


6 COLONEL WEISS:you've taken up four minutes at
7 least.

8 MR. WHITE: Okay.

9 COLONEL WEISS: (Indiscernible).

10 MR. WHITE: Sorry about that. One of the things that's
11 been brought up by our members is the narrow slot that would be
12 available to transit up the Richardson Highway and the
13 possibility of possibly shaving some of the eastern boundary of
14 2202 if the restricted area is approved over the battle area
15 complex to give us a little more breathing room to transit that
16 area and de-conflict with opposite traffic. That is a heavily
17 traveled area, especially in low weather, because we tend to
18 follow low terrain and we need as much room as we can. Also
19 understanding that if it's bad weather chances of you having
20 live weapons release from an aerial platform in the battle area
21 complex is probably pretty limited.

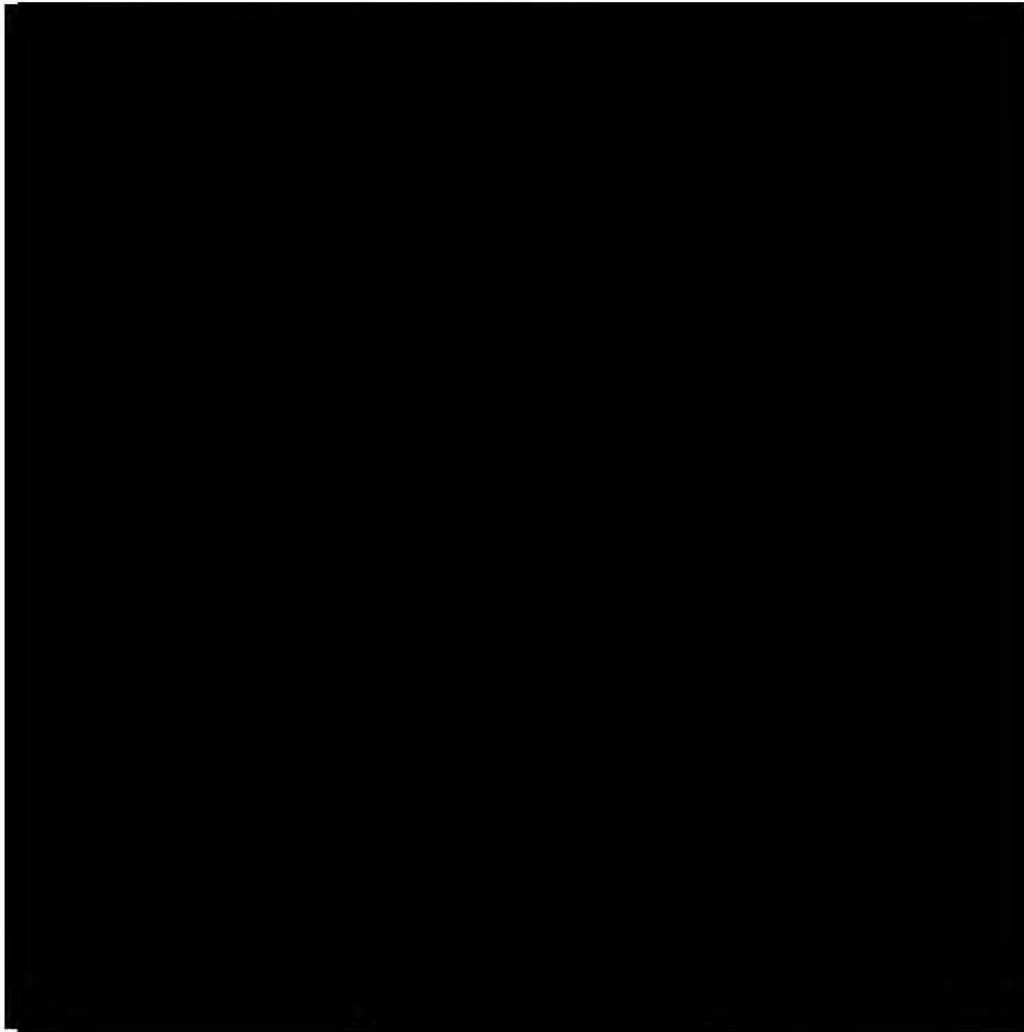
22 But here again, we're dealing with an education issue of
23 our constituents. They see an area on a map. Unfortunately
24 they don't always research it to the point to realize that it's
25 only activated during certain times and that's an education



N0017

1 issue that we constantly struggle and deal with and ask for your
2 patience on especially.

3 And I guess that concludes my oral statements and
4 encourage you to look for a written statement before the
5 deadline of June 7th. So thank you.



N0018



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

May 23, 2012

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex

To Whom It May Concern,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period.

Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National Environmental Policy Act (NEPA).

AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed actions. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings.

AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams". The signature is fluid and cursive.

Heidi J. Williams
Vice President
Air Traffic Services and Modernization

AIRCRAFT OWNERS AND PILOTS ASSOCIATION



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N0019

May 10, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

Dear Sir:

The Greater Fairbanks Chamber of Commerce (GFCC) would like to respectfully request the extension of the comment period for the Joint Alaska Pacific Range Complex (JPARC) draft Environmental Impact Statement (EIS). We would like to recommend an additional 60 days which will allow for further comments and analysis based on recent USAF proposals and basing decisions at Alaskan installations.

The Air Force, by its force restructuring action, which is not considered in the current EIS draft, of shifting the Eielson F-16s, associated military, and civilian personnel to JBER has created undetermined impacts on Alaskan air space and Alaska's population. These changes are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals potentially affected by, as yet, unidentified impacts on Alaska's land, water and air space.

The GFCC has a longstanding relationship with the military in Alaska and supports the military's involvement in the Interior in several ways. In 2012 the Chamber's Board of Directors and Military Affairs Committee adopted "Continue to Strengthen the Military Presence in Interior Alaska" as one of its most important priorities. We understand the importance and strategic advantage that JPARC offers for a variety of military training opportunities. However, for the reasons stated above we believe this 60 day extension is warranted.

Sincerely,

Lorna Shaw
Chair, Board of Directors

Steve Lundgren
Chair, Military Affairs Committee

Lisa Herbert
Executive Director

INVESTORS

DIAMOND

BP Exploration
ConocoPhillips
ExxonMobil
Fairbanks Daily News-Miner
Fairbanks Memorial Hospital &
Denali Center
Flint Hills Resources Alaska
Mt. McKinley Bank
Santina's Flowers & Gifts

PLATINUM

Alyeska Pipeline Service Co.
Carlson Center
Doyon, Limited
Fred Meyer Stores
Golden Heart Utilities
Wells Fargo Bank Alaska

GOLD

Birchwood Homes
Denali State Bank
Design Alaska
Doyon Utilities LLC
First National Bank Alaska
GCI
Kinross-Fort Knox Mine
Lynden
MAC Federal Credit Union
Northrim Bank
Sumitomo Metal Mining Pogo LLC
Usbelli Coal Mine

SILVER

ACS
Alaska Airlines
Alaska Railroad
Alaska USA
Dr. Christopher Henry – Henry
Orthodontics
Everts Air Cargo, Everts Air AK
Exclusive Paving/Univ. Red-Mix
Fairbanks Natural Gas
Flowline Alaska
Fountainhead Hotels
General Teamsters Local 959
GVEA
Hale & Associates, Inc.
JL Properties, Inc.
Key Bank
Personnel Plus
Shell Exploration & Production Co.
Spirit of Alaska FCU
Tanana Valley Clinic
TDL Staffing
Totem Ocean Trailer Express, Inc.
Tower Hill Mines-Livengood Gold
Project
University of Alaska Fairbanks
Verizon Wireless
WAL-MART Stores, Inc.
Yukon Title Company



N0020

[REDACTED]

From: Corky [REDACTED]
Sent: Wednesday, May 30, 2012 8:24 PM
To: ALCOM J08 Admin Box
Subject: JPARC
Attachments: MOA LLCNPC.docx; MOA Letter Matthews 2.docx

N0020

LAKE LOUISE COMMUNITY
NON-PROFIT CORPORATION

May 30, 2012

To: ALCOM Public Affairs
Subject: MOA Expansion

The Lake Louise Non-Profit Corp. (LLCNPC) represents the 245 homes and cabins in the Tri-Lakes area. With the exception of a few owners, the Community is opposed to the expansion of the FOX 3 and Paxson MOA.

Residents have expressed many different reasons for their opposition: low level military aircraft pose a hazard to civil aircraft, disturbance of nesting birds and waterfowl, disturbance of caribou calving, excess noise, fire hazard, use of State lands when the majority of Alaska land is held by the Federal Government.

The Lake Louise area has been chosen by residents because of its beauty, quiet, clean water, and wildlife. Had they wanted air traffic, their property would have been selected next to an airport.

Five hundred AGL operations are totally unacceptable and the LLCNPC wants to go on record as strongly opposed.

Sincerely;

Beverly Matthews, President

HC 01 Box 1684b
Lake Louise Road
Glennallen, Alaska 99588

N0021

From: Barney Lowe [REDACTED]
Sent: Friday, June 01, 2012 6:30 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex (JPARC) proposed changes

As a former military aviator and currently a civil aviation user I feel this is a good example wasted federal dollars and valuable military assets. This whole project is not needed. It appears to be an EMPIRE BUILDING PROJECT which I oppose.

Thank You
Barney Lowe Mgr
Pico Aviation
Del Rio, Tx

N0022

1

ALCOM PA,
9480 Pease Ave.
Suite 120
JBER, AK 99506
June, 6,2012

Dana L. Olson

RE: Moderation and Enhancement of Ranges, Airspace, and Training Areas

On behalf of the AmberLake North Homeowner's Association, who won, material sites, for the prosperity of its creation by the DNR, the position is that we object.

We were created for public purpose and mission. We have had past experiences, of being excluded from consistencies reviews in coastal consistencies, due to re-drawn boundaries. We have had plane crashes, not addressed by the DNR, to the satisfaction needed. We can not be subject to political whim, because there is a record establishing the objectionable nature is be ruled under a recreational standard, such as when opposing the loss of Oil Well Road, for keeping animals protected in the corridor called Alaska Wild Rivers; before the Alaska legislature (by testimony).

The State has a whistle blower statue, but only for state employees. This makes the EIS deficient on its face, because there are unsettled land claims in our area. If the State has not reconciled, the tentatively transferred federal land to the state, and notices have been ignored because of the whistleblower statue and employees, who do not have confidence in their job security.....the region known as Amberlake/ Amberlake North; humbly respects removal, from your consideration.

Creating titles on non recognized parties, before claims are settled, makes this region unsuitable for your or the nation's needs.

Peer review is deficient under an engineering standard, because this past semester, peer review demonstrated that buildings do not implode by fire intensity, because the quantum physics properties recognize the second property of thermodynamics. That property has fire reversing on its self, and is seen. The necessity does not call for an EIS.

The idea that you can use quantum physics, and I can get academically punished, is ground, to file a complaint. Who am I going to complain to?

When a student desires to know the truth and the truth is structured to support social sciences only, I object under science.

Until the President of the United States decides the land Claim issues, decisions concerning who owns what, will cloud your efforts. I applaud your science, but I am

N0022

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bound to a rock geology standard, that is suppose to give the prevailing notice or approval. While those who seek to discredit me, my work is on Elmendorf, and Eielson ABF.

Sincerely in objection,
The folks and dissents in the AmberLake/ AmberLake North region
Dana L. Olson



Dana L Olson
June 6, 2012
by fox and mail (hard copy)

N0023

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0023	Dwayne King	Director	Kingdom Air Corps	1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>We at Kingdom Air Corps, mile 81 on the Glenn Highway are grateful for the opportunity to make comments to the Alaskan Command. We appreciate your desire to get public input, and we hope and pray that you take us very seriously. I have over 15000 hours, and 45 years experience as a commercial pilot and flight instructor in this area of Alaska. Training dozens of people in the Glennallen, Chickaloon, Tok, and Bettles area. We make numerous flights to Fairbanks from our base at AK-59 King Ranch, operating 14 aircraft, 3 turbine helicopters, from our base north toward Fairbanks, Talkeetna and Paxson. My son, David King operates in the Alaska Range, especially in the Tangle Lakes area, with three helicopters, in mining operations. We oppose the expansion of the FOX MOA, because it endangers our people, our business, and our lifestyle. We have managed all of these years to be accident free, but an expansion of the MOAs, puts a greater risk on all of us. We're not authorities in military operations, how can we be experts in military operations? But we think it will be more risky for all of us. And for sure it will change the freedom that we have had all of our lives, hunting, mining, working, and flying in these areas that are proposed to become Military Operations areas. We fought the expansions of Federal lands for Parks, and have seen the encroachment of Federal rules upon us through the years. When we lived in Bettles, we opposed the massive Parks acquisition of The Gates of the Arctic; sitting in meetings and voicing our opinions. The same thing happened to us when we lived in Glennallen for eight years; just at the time the Wrangle-St Elias Park was established. We voiced our opinions and we never really got any good answers. They said it wouldn't effect public flying, but then we began to hear that they complained that we flew below 2000 feet above Park lands. We are the kind of people that are very supportive of our military. We really like the free lifestyle of Alaska. We like our guns, our hunting, flying low, gravel bar-hopping, and flying around the peaks. We take about 300+ people sightseeing at all different altitudes, in the Talkeetna and Chugach Mountains. I can't ever remember getting a response from these comment sections that we fill out. Does it really do any good to fill these out. We know our voices are being heard, but does it make any difference? Please respond. We are people who are seriously impacted by the expansion of military operations. Thank-you for listening, Dwayne King Director Kingdom Air Corps.</p>

N0024



*Executive Office
Telephone: (907) 265-2498
Facsimile: (907) 265-2312*

June 11, 2012

Lt. General Stephen Hoog
Alaskan Command & Joint Task Force Alaska
9480 Pease Avenue, Suite 107
JBER, AK 99506-2100

Dear Lt. General Hoog:

On behalf of the Alaska Railroad Board of Directors and our employees, I would like to express our support for the continued development and investment in the Joint Pacific Alaska Range Complex (JPARC). The JPARC Draft Environmental Impact Statement (DEIS) is a welcomed next step in a process that we hope will result in enhanced training opportunities for our United States Armed Forces.

As a state-owned corporation, part of the Alaska Railroad's charter is to support economic development and provide critical support services to our military operations. Our current project to build a bridge across the Tanana River near Salcha meets both requirements. This project is phase one of a multi-phased project called the Northern Rail Extension that will eventually build rail to Delta Junction. This will support future resource development, passenger service options for civilians and military personnel, and will connect the Fort Greely Army Installation by rail to all other major military installations and strategic port facilities in Alaska. In the short term, the Tanana Bridge will provide an important year-round transportation land link to the vast military training grounds encompassed in the JPARC area.

We are proud to be constructing a project that represents an important first step in modernizing and enhancing JPARC and we encourage the adoption of alternatives that continue building on this investment. JPARC is the largest military training range in the United States and is critical to securing and defending our nation.

The Alaska Railroad will continue to work with the State of Alaska, the Federal Government, the U.S. Military and the local community to help ensure we are providing the best support possible to the courageous men and women who defend our nation.

Warm Regards,

Linda Leary, Chair
Alaska Railroad Board of Directors

327 W. Ship Creek Avenue
Anchorage, Alaska 99501

MAILING ADDRESS
P.O. Box 107500 Anchorage, Alaska, 99510-7500

TEL 907 265 2300 FAX 907 265 2416
AlaskaRailroad.com

N0025

ALCOM Public Affairs
9480 Pease Ave, Suite 120
JBER, AK 99506

6/14//12

Dear JPARC Planning Team.

The following comments are submitted by the Alaska Quiet Rights Coalition (AQRC) as testimony concerning the Joint Pacific Alaska Range Complex Modernization and Enhancement Draft EIS, published March 2012.

As stated in the AQRC scoping comment letter of 1/31/11, AQRC is a statewide non-profit organization dedicated to protecting the important resource of natural quiet on our public lands for the benefit of all Alaskans, visitors, wildlife, and future generations. State surveys have shown that the majority of Alaskans cherish the beauty, peace and quiet of wild places, and consider that peace and quiet necessary and important to their lives. Natural Quiet is a natural resource that is an essential ingredient of wild areas.

AQRC reluctantly supports the no-action alternative, but has a strong preference for an alternative that would reduce the size of the existing MOAs, not leave them as they are or increase them. While AQRC is appreciative of the role of the military and the need for training to stay current, the proposal to, once again, expand the already enormous areas of MOAs and increase the training exercises with their accompanying noise, safety, and environmental degradation issues, sacrifices the quality of life that Alaskans cherish. It is also a major threat to wildlife resources.

Human effects:

Low altitudes to 500 feet are not compatible with acceptable civilian quality of life. Both Alternatives A and E include this level which was rejected in the past by both military and civilian reviewers and should be rejected now.

Noise created by military aircraft adversely affects rural and backcountry users. There are all kinds of recreationists along the Richardson and Denali Highways, cabin owners in the Lake Louise area, backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters and fishers throughout the expanded areas being proposed. The mitigation suggestion of publishing times of training missions, as proposed, will not be sufficient to meet their many and varied interests and needs. Further, there are many homes and growing communities along the Glenn and Richardson Highways, and elsewhere in the Copper River Basin that would be negatively affected by either Alternative A or E.

The Draft EIS quotes various standard noise measurements such as the day-night average noise level and the FAA and EPA standards for noise safety. The FAA mission is airplane safety. The EPA standards address noise as it effects physical health. None of this is relevant. As is admitted in Chapter 3, noise is not experienced as an average and noise increase in quiet areas has greater impact than in less quiet areas. The impact of machine or ordnance noise is to remove peace and quiet. The Draft EIS Alternative A indicates that sonic booms would become much more frequent in Fox 3 and "would be expected to be considered significant."(3.1.2) According to the Draft EIS, in Alternative A subsonic noise under the Fox 3 expansion and new Paxson MOA would result in problems. "Overall, the relative (noise)change

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is high, and in quiet settings, these increases would be highly noticeable and cause potentially significant impacts on communities.” (3-79)

The Draft EIS describes the expanded Fox 3 and the new Paxson MOA as being over rural and sparsely populated areas, as if that made noise less of a concern. The opposite is true. The very value of those areas are that they are rural and sparsely populated and therefore a resource to be enjoyed and treasured. If the military judges the effect of its actions by the number of people adversely affected, then the judgement being made is that cities are to be saved and wild areas are appropriate sacrifice zones. Many Alaskan civilians see it the other way around. Cities and noise are expanding. Wild areas and natural quiet are shrinking and becoming progressively more valuable. Alaskans live here in this cold dark place because we value the wild and the peace and quiet above all.

Wildlife effects.

As AQRC has stated in the scoping letter, mammal mating, birthing, feeding, resting, and migrating have been shown to be sensitive to stress in different species at different times. Similarly bird mating, nesting, feeding their young, fledging, food storing for migration or winter, migrating or wintering have been shown to be sensitive to stress in different species at different times. Few, if any, windows of opportunity are available when air noise and/or ordnance will not have negative effects on wildlife. The Alaska Department of Fish and Game has written to you with concerns that both the low level flights and the large scale training could disturb all species. (March 1, 2011)


The Draft EIS Alternative maps show extensive overlay of Dall Sheep, Caribou calving, and Trumpeter Swan nesting areas. The EIS claims that effects would be short term based on a few studies in other areas. No reference adequately supports the claim that Alternative A with mitigation would have “moderate effects on wildlife and would not be measurable at the population level and not significant.”(3.1.8) No MOA expansion or decrease in flight altitude should occur before specific studies on the effect of various kinds of military noise on moose browsing, Dall sheep lambing in both the Alaska Range and Talkeetna Mountains, caribou calving in the northern Talkeetna Mountains, migration, nesting and fledging of water fowl, including Trumpeter Swan, are done.

For the above reasons, AQRC supports:

- No action alternative.
- No reduction in flight altitude levels.
- No increase in ordnance and training areas.

The perceived need to keep expanding air and training space to keep up with technology never ends. However, our land is finite. When will enough be enough? What volume of civilian outrage is sufficient to stem this inexorable take-over by the military asking itself if it should have more space and answering “More More More.”

Sincerely,


Elizabeth Hatton
Alaska Quiet Rights Coalition



N0026

[REDACTED]

From: McCaffrey, Melissa [REDACTED]
Sent: Wednesday, June 27, 2012 3:27 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: JPARC Comments 6-26-12 Final (1).pdf

To whom it may concern,

I am submitting the Aircraft Owners and Pilots Association's formal comments regarding the DEIS for the JPARC, a confirmation of the receipt of our comments would be greatly appreciated. Please feel free to contact me with any questions directly, thank you.



Melissa McCaffrey
Senior Government Analyst, Air Traffic Services
421 Aviation Way (301) 695-2228
Frederick, MD 21701 melissa.mccaffrey@aopa.org

N0026



421 Aviation Way
Frederick, Maryland 21701

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www.aopa.org

June 26, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Re: Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace and Training areas in the Joint Pacific Alaska Range Complex

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex (JPARC). The U.S. Department of Defense (DoD) has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country occupies some 65,000 square miles of airspace over land, and 42,000 nautical square miles of airspace over the Gulf of Alaska. A series of proposals are included in the DEIS that would further expand this complex. It is imperative that aviation safety and access be preserved for civil users of the complex, given the importance of aviation for basic transportation in the state of Alaska.

Economic impact of civil aviation in Alaska

According to *The Economic Contribution of the Alaska Aviation Industry to Alaska's Economy*, by Northern Economics, Inc., the aviation industry in Alaska contributes \$3.5 billion, or approximately 8% of the gross state product. The fact that this is proportionately almost 40% greater than the industry's role in the national economy demonstrates the importance of the aviation industry to Alaska's economy. An estimated 47,000 jobs are directly and indirectly related to aviation in the state of Alaska. Given the importance of aviation to the state's economy, it is important that the proposed changes to the airspace do not harm this industry, or significantly limit access to resources in the state.

Proposed MOA Expansion

The proposed expansion of the Fox 3 Military Operations Area (MOA) is a significant increase both in lateral and vertical dimensions, lowering the floor from 5,000 feet above ground level (agl) to 500 feet agl. The area encompassed in the proposed expansion is frequently used by

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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general aviation pilots and air taxi operators to support hunting camps and mining operations, conduct air tour operations, access recreational areas or make other uses of this region. Due to its proximity to the population centers of Anchorage, the Mat Su Borough and Fairbanks, where the airspace is heavily used by civil aviation, there would be an increased collision potential with high-speed military aircraft executing training maneuvers in the Fox 3 MOA airspace. Due to the importance of the proposed airspace area for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

The DEIS includes the proposed Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major Visual Flight Rules (VFR) route which links northern Alaska with south central and south east regions of the state. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use and are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which tends to concentrate VFR traffic and increases additional potential for a mid-air collision risk. The proposed Paxson MOA should be limited to high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

Special Use Airspace Information Service Coordination

The creation of the Special Use Airspace Information Service (SUAIS) in the 1990's for portions of the JPARC has had a positive impact on VFR usage of the current airspace complex that extends across an area over 300 miles wide. In areas where there is adequate communication and surveillance, this has greatly improved the situational awareness for both civil and military airspace users. Pilots have reported that in the eastern portions of the complex, communications are not adequate and they are experiencing difficulties with the mix of civil uses and military training activities.

Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with Range Control during times that MOAs are active. It is also essential that the tape recorded message broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the DEIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace this is not ample assurance that infrastructure will be provided. It is essential that funding be allocated for the addition of radio repeaters, staffing or other infrastructure costs to provide sufficient coverage for any expanded airspace. This infrastructure should be installed and operational before any additional airspace is approved.

IFR Access to MOA airspace

Instrument Flight Rules (IFR) access is essential to improving access and aviation safety between Alaska's communities, including those that are under the MOA airspace already contained within the JPARC. Expansion of T-Routes and WAAS approaches are providing this

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access under a wider range of weather conditions, adding to the benefits of the IFR system. Those benefits are seriously degraded by expansions of MOAs that preclude IFR access for all but emergency or Lifeguard flights. AOPA requests that no additional MOA airspace be added to this complex until provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system. For example, an aircraft needing to fly from Fairbanks to Tok would normally make a relatively direct 158 nautical mile flight along the airways. When the Delta MOAs are active, aircraft are re-routed, increasing the distance around the airspace to 450 nautical miles, a 2.8 times increase in distance. Due to the huge size of this MOA complex, lacking the ability to cross them using the protections of the IFR system is a significant safety as well as economic impact on the aircraft operators, and the customers that pay for the increased operational cost.

The relatively low volumes of IFR operations suggest that the impact to military training of supporting IFR access would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military “train like they fight.” The JPARC provides an ideal test bed to develop this capability, which will require cooperation with the FAA and military agencies.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area.

AOPA opposes the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace. We suggest the military seek other means to allow training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.

Realistic Live Ordinance Delivery

The proposals to establish restricted airspace for live ordinance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor and the recreational and mineralized areas in the Alaska Range to the south. Existing Restricted Areas R2211 and R-2202 already inhibit air traffic attempting to transit the airspace. Connecting these two restricted areas would create an overall barrier to access in this area; AOPA would like to see effective mitigation to address these concerns.

Remotely Piloted Aircraft/Unmanned Aerial Vehicle corridors

The DEIS proposes establishing restricted airspace corridors for the purpose of navigating Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicles (UAV) from military airfields into various restricted airspace areas. There is no doubt that unmanned aerial vehicles play an

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important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community.

The FAA has consistently denied the addition of new restricted airspace areas for the sole purpose of RPA/UAV operations or for anything other than hazardous activity since Restricted airspace is for containment of hazardous operations. En-route RPA/UAV flights transitioning between the Eielson Air Force base and existing restricted airspace is not a hazardous operation. The proposed establishment of restricted airspace corridors for this purpose is an attempt to circumnavigate the RPAs/UAVs inability to see-and-avoid participating traffic. While awaiting development of a true sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without segregated airspace. The corridors that are proposed would clearly interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range.

F-16 Relocation Proposal

While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson Air Force Base in support of military training activities, to Joint Base Elmendorf Richardson (JBER). The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impact of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport.

Given the conflicting nature of these two military proposals, it appears that the F-16 relocation cannot help but influence the cumulative impact of the overall JPARC proposal. More analysis of this plan by the military with presentation to the public is required to understand the true impact on this development to allow informed public comment.

Fifth Generation Fighter Jet Statement Inconsistent

AOPA has concerns with a portion of the JPARC document "description of proposed action and alternatives", Section 2.0, 2.1.1 Fox 3 MOA Expansion and New Paxson MOA which states, "...as the fifth generation of U.S. fighters (F-22 and F-35 aircraft) are developed, fielded and deployed in combat, pilots will need to train in the skills and tactics appropriate for these aircraft within an airspace best configured for such training." This statement is in direct contrast with the United States Air Force (USAF) F35A Training Basing EIS, Airspace and Range Use, F-35A, which states, "...flight activities would take place in existing airspace; no airspace modifications would be required for any of the scenarios."

It remains unclear whether the USAF is stating that the addition of fifth generation type fighters require additional airspace accommodations or they will be contained in existing airspace.

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AOPA would welcome clarification on this issue as these two USAF documents appear to be in conflict with one another. With the national implications inherent in this debate, AOPA opposes the creation of additional Special Use Airspace to accommodate new aircraft without further consideration of a “giveback” of airspace no longer needed.

Evaluation of other Alaska MOAs

While the DEIS proposals focus on expansion of the airspace in the core area centered on Eielson AFB, there are historical MOAs in other parts of the state that are defined as elements of the JPARC. Given the emphasis on reduction of operating costs, this is an appropriate time to evaluate the present uses of the Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs. No data was found in the DEIS on uses of these MOAs other than limited use data on the Stony MOA.

AOPA would ask the DoD to perform an analysis of existing and future uses of Stony, Naknek, Susitna, and Galena MOAs as part of JPARC to establish their continued need given the changes in training requirements, and need for operational efficiency described in these proposals. Results should be included in the final JPARC Environmental Impact Statement and shared with the public with an opportunity for comment.

Summary

AOPA appreciates the opportunity to submit comments on the DEIS for the JPARC and looks forward to working with the DoD on solutions that equitably accommodate both the military’s need for realistic training, and the needs of the civil aviation community.

We urge the military to work collaboratively with the aviation community on plans that incorporate more effective IFR coordination for transit through active MOAs and more reliable SUAIS implementation. Finally, we implore you to keep in mind that airspace, especially in the Alaskan Frontier, is the lynchpin that enables many small communities to exist. Any alteration to this vital resource must be approached with the utmost caution. Thank you and please contact me with questions you may have.

Sincerely,



Melissa McCaffrey
Senior Government Analyst
Air Traffic

N0027

[REDACTED]

From: b. long [REDACTED]
Sent: Thursday, July 05, 2012 3:27 PM
To: ALCOM J08 Admin Box
Subject: JPARC DRAFT EIS COMMENTS
Attachments: JPARC.doc

Attached here are the comments of the group Alaska Survival regarding the JPARC draft EIS Enhancement and Modernization.

Request that you acknowledge receipt of these comments.

Thanks,
Becky Long

N0027

PUBLIC COMMENT
MODERNIZATION AND ENHANCEMENT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
JOINT PACIFIC ALASKA RANGE COMPLEX

7/4/12

BOARD OF DIRECTORS
ALASKA SURVIVAL
[REDACTED]

Alaska Survival is a Talkeetna-based nonprofit Alaskan corporation that seeks to protect the health of both people and the natural ecosystem by endeavoring to maintain the integrity of Alaska's land, air, and waters.

THE NO ACTION ALTERNATIVE: THE ONLY REASONABLE ALTERNATIVE

The JPARC military representatives have said that they cannot consider the No Action Alternative. Page 6 of the DEIS says that the status quo is not good enough for the modern and emerging weapons. There is no proof for this assumption beyond what JPARC says.

At the Talkeetna public meeting, we were told that if this expansion is accepted that there would be 2 supersonic sorties a day, 5 days a week with the potential for increased supersonic flights during training periods with other military from other countries. This will irrevocably change the public lands, the environment and the quality of life for those areas. People outside the areas will hear the sonic booms.

The April, 1997, Record of Decision for the final EIS for the Alaska Military Operations Areas diminished the Fox MOA by 910 square miles to its present location and raised the proposed minimum flight altitude from 3000 feet AGL to 5000 feet AGL due to undesirable noise impacts and to preclude the potential for direct over flight of sensitive resources. These were sensible decisions and should be retained as the status quo.

Much of the existing Fox 3 and proposed expansion is within the Mat Su Borough (MSB). The MSB is the fastest growing area in Alaska with the population expecting to double in the next 20-25 years. The expansion of Fox 3 and the creation of Paxson MOA would expand military operations southerly including the Talkeetna Mountains which are adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View. The Lake Louise area has approximately 80 year round residents with about 500 private

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N0027

property parcels. To do good planning, it must be assumed that these parcels will be occupied year round in the future.

We support the Lake Louise Community Non Profit Corporation and the Talkeetna Community Council in their concerns of the noise impacts on the local economy, lifestyle, wildlife, recreational use, and civilian aviation.

In the 15 years since the last EIS, the civilian use of the air and ground space in the Fox 3 and Paxson MOAs has significantly increased. There is more public use of the air space and the military must take this into consideration. These 2 areas are the breadbasket of Alaska, the heart of valuable natural resources that make Alaska what it is. Pristine public land, fish and wildlife resources, remote wilderness lifestyles, hunting, fishing, recreating, subsistence uses. This is what makes Alaska what it is. This is threatened by anything than the No Action Alternative.

SUPPORT MSB RESOLUTION 12-076

This Resolution was passed unanimously by the Borough Assembly 6/28/12, and it states our concerns succinctly.

Many MSB residents and visitors depend upon the airspace within the proposed expanded airspace for accessing the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter/hiker guiding, operating lodges, operating mines, and for various non-commercial, recreation, and subsistence activities, such as hunting, hiking, food gathering, sightseeing.

The proposed airspace expansion would cover the Nelchina caribou herd calving grounds located within the MSB and the important Dall sheep lambing area/important ewe/lamb habitat in the Black Rapids Glacier and Mountain areas.

The proposed lateral and vertical expansions would increase the probability of conflict between civilian and military aircraft. The potential for near misses or midair collisions is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these areas for hunting, fishing and other recreational and subsistence activities traveling at low altitudes under Visual Flight Rules.

General aviation, air taxi, and air charter pilots flying under Instrument Flight Rules conditions would be prohibited from travel through an active MOA. The Richardson Highway is a major aviation transportation corridor for civil aviation traveling north-south.

N0027

We agree with the MSB Assembly that the minimum flight training altitude should NOT be lowered to 500 feet for the Fox 3/Paxson MOA's due to potential impacts on wildlife, civilian aircraft traffic and recreational uses. In these MOA's, the Air Force must conduct all supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL whichever is higher in order to reduce sonic boom intensity and its effects on the surface.

The Department of Defense must delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife areas underlying any new or expanded MOAs consistent with the current restriction identified in the 1997 Alaska MOA EIS. These restrictions would include, but not be limited to, minimum overflight altitudes over wildlife areas, including waterfowl, raptor and other migratory bird nesting/breeding/concentration areas, Dall sheep lambing areas, caribou and moose critical season habitat areas. These should be reviewed, identified and expanded if necessary with the assistance of the Alaska Department of Fish and Game and the US Fish and Wildlife Service.

Time and area restrictions must be evaluated and established to ensure the public's use of the area and the sustainability of the natural resources. There should be NO Major Flying Exercises and overflight of popular subsistence areas, hunting, areas, campgrounds and trails (5000 feet AGL and half-mile lateral distance) during peak use periods between June 27-July 11, mid-August through September, and during other important hunting seasons determined by the Alaska Department of Fish and Game.

There must be detailed maps, aeronautical charts and information to the public especially in the communities near Fox 3 and Paxson MOA's that identifies flight corridors, restricted or closure areas and dates of training use.

CUMULATIVE IMPACTS

We disagree with the statement on page 13 of DEIS that the cumulative noise impacts that would occur where the twelve JPARC proposed action overlap would not be significant and would not create disproportionately high and adverse environmental or health effects. There is no data supporting this statement. We disagree with the statement on page 14 that no significant restriction to subsistence resources are expected from the cumulative effects of the JPARC proposed action, other DoD actions, and non-DoD actions.

There are 3 current and proposed actions and 1 legislatively designated area that did not make it to your list of cumulative impacts in the DEIS and must be considered.

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Proposed Susitna-Watana Hydroelectric Project

This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide and will be a focal point for increased human presence in the project area.

Mineral Exploration/Production in Fox 3 and Paxson MOA

There is active mineral exploration on claims by the company Pure Nickel's Man Alaska Project (2009-2014). These are 240 miles of claims on state land called the Denali Block as well as some on the federal Bureau of Land Management land. The production could be open pit or underground mining. Both methods involve waste rock dumps, tailing stacks and ponds, toxic dust from ore trucks, mine drainage, transmission lines, and access roads. This mineral exploration affects the same migratory wildlife, and the same recreational and subsistence resources of the JPARC expansion DEIS and has its own air and noise pollution negative impacts.

Denali Air Special Recreational Use Permit

Denali Air is requesting to be able to conduct scenic glacier landings by fixed-wing aircraft near Mt. Deborah on portions of the Yanert and Gillian Glaciers, with up to three departures daily from May 10 to October 10. Currently, BLM is conducting an Environmental Assessment.

Nelchina Public Use Area (NPUA)

The NPUA encompasses 2.5 million acres of state land in the Talkeetna Mountains and was established by the state legislature in 1985. AS 41.23.010 states that the mandate is to protect, perpetuate, and enhance the fish and wildlife habitat and the public enjoyment of such habitat by the activities of fishing, hunting, trapping, recreation, and additional public uses. In particular, the Nelchina Caribou calving grounds, trumpeter swan nesting areas, and habitats for Dall sheep and brown bear are to be protected. Under AS 41.23.020, the Alaska Department of Natural Resources is directed to adopt a management plan, but this has never been done. It has been managed for

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multiple-use under the guidelines of the 1985 Susitna Area Plan and now under the 2010 Susitna Matanuska Area Plan, currently under appeal.

Not enough attention is being given to the proposed JPARC expansion on this this legislatively designated area, which is vulnerable to project impacts because there is no specific management plan. This needs to be considered.

CONCLUSION

For all of the above reasons, we support the No Action Alternative, the status quo with the caveats discussed in these comments. We do NOT want Alaskan lives and lands to become a live-virtual-constructive range. This expansion creates a war zone type atmosphere in a state that treasures the pristine and spectacular public lands that underlie the expanded Fox 3 MOA and the creation of a new Paxson MOA.

Becky Long
Board of Directors

N0028

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0028	paul roderick	president	talkeetna air taxi	General (to the EIS), Airspace Management, Noise, Safety (Airspace), Safety (Ground), Land Use, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxton MOA	test not sure if these comments are submitting.

N0029

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0029	Arthur Hussey	President	General Aviation Association of Fairbanks International Airport	General (to the EIS), Airspace Management, Safety (Airspace), Infrastructure and Transportation, All proposed actions	<p>The General Aviation Association of Fairbanks International Airport works with approximately sixty pilots and businesses in promotion of general aviation in and around the Fairbanks International Airport area. In this context, we are pleased to submit comments on the proposed JPARC expansion. Key points of concern to our membership include: a) in light of the proposed relocation of fighters from Eielson to JBER, the expansion should be re-evaluated. It is likely that training requirements for Eielson based aircraft and airmen would substantially change if the relocation were to occur. b) The EIS should strongly re-examine the possibility of expanded SUAIS. This is needed because of the increased low level traffic the JPARC envisions, combined with frequent slow-moving VFR traffic in the area. c) The floors for the Fox MOAs should be re-examined, and lifted from the 500 feet proposed to at least 2,000 feet. It should be noted that flight, even VFR flight, at less than 500 feet, as would be needed to remain away from active military operations, is hazardous and in some cases could be deemed illegal. d) UAV Corridors, while understandable for increasingly common UAVs, should not be constructed in such a manner as to significantly restrict access of general aviation aircraft, both VFR and IFR, to Fairbanks airport. It should be noted that there is significant General Aviation traffic on the east-west axis and that the UAV corridors, as proposed, would restrict that, placing higher requirements on fuel to be carried (due to more circuitous routings) or potentially reducing safety margins. e) Finally, the proposed Battle Area Restricted Area is of significant concern. As anyone familiar with the area knows, this Restricted Area would occur in a region of potentially high winds and varying visibilities. To confine the general aviation community to a single north south corridor could easily compromise safety. We ask that this new Restricted Area be dropped from consideration. In closing, the General Aviation Community appreciates the opportunity to comment on the EIS and looks forward to continued partnership with the military and other parties involved in this important discussion. Sincerely, Arthur Hussey President General Aviation Association of Fairbanks International Airport</p>

N0030

[REDACTED]

From: Megan Reilly [REDACTED]
Sent: Monday, July 09, 2012 6:40 PM
To: ALCOM J08 Admin Box
Cc: Deantha Crockett; Edward Hild; Jim Palmer - Staff to Murkowski ; McKie Campbell ; Tara Shaw; David Ramseur; Susanne Fleek; Chad Padgett; 'Erik Elam'; Governor Sean Parnell; Joe Balash; Kip Knudson; Randall Ruaro
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: AMA JPARC 07-09-2012.pdf

To Whom It May Concern,

Per Deantha Crockett, Executive Director – Alaska Miners Association, please see the attached comment response concerning the Joint Pacific Alaska Range Complex EIS.

Should you have any questions, Deantha Crockett can be reached at Deantha@alaskaminers.org or at 1-907-563-9229.

Kind Regards,

Megan Reilly
Office Manager
Alaska Miners Association
3305 Arctic Blvd., Ste. 105
Anchorage, AK 99503

[REDACTED]

www.alaskaminers.org

Cc:
Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell

N0030



ALASKA MINERS ASSOCIATION, INC.

3305 Arctic Blvd., #105, Anchorage, Alaska 99503 • 907 563-9228 • FAX: (907) 563-9228 • www.alaskaminers.org

July 9, 2012

ALCOM PA
9480 Pease Avenue, Suite 120
JBER, AK 99506
www.jpaccis.com

RE: Comments on Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement
– Draft Environmental Impact Statement

To Whom It May Concern:

Thank you for the opportunity to comment on this important proposal to expand the Joint Pacific Alaska Range Complex (JPARC). The members of the Alaska Miners Association will be severely impacted by this proposal.

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. The AMA is composed of more than 1400 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials. Our members live and work throughout the state including much of the area covered by the proposed expansion of JPARC.

We are pleased with some of the changes that have been made over previous alternatives but the current proposals DO NOT address the concerns expressed in AMA's letter of March 4, 2011 submitted during the scoping period for the DEIS. AMA noted that "Expansion of restricted airspace will greatly complicate the ability to develop mineral resources on state, borough, federal, and private lands, including Native owned lands. Much of the region covered by JPARC alternatives is remote and is accessible only by air." With the current DEIS proposal this statement should be changed to read "... will effectively close some State of Alaska lands to any use, including exploration and mining." Also, the DEIS does not adequately recognize the conflicts between low-level high speed military aircraft and helicopters and fixed wing aircraft used to access remote exploration and mining properties. The proposed changes in the DEIS will result in significant conflicts regarding access to and use of mineral lands. The DEIS significantly underestimates the potential conflicts and the impact on mining.

Specific comments and recommendations:

1. **Maximize the use of airspace above the 60% of Alaska that is federal land.** This recommendation was made in the AMA March 4, 2011 letter but we can discern no attempt to consider this approach. Most of the land under the proposed new and expanded MOAs is state owned and currently available for mineral exploration and development and much of this land has mineral potential and/or active mineral exploration and development.

The Alaska Statehood Act promised the State it could select and receive title to approximately 104 million acres out of the 365 million total acres in the State. However, before the State could complete its selections, Congress passed the Alaska National Interest Lands Conservation Act (ANILCA) which placed more than 100 million acres in federal Conservation System Units (CSUs) which included parks, preserves, refuges, monuments, "Wildernesses", wild and scenic rivers, etc. This Act removed these lands from the opportunity for selection by the state and removed them from all commercial development, including resource development. Much of

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these lands were highly prospective for mineral development. The current JAPARC DEIS would eliminate mineral development on portions of the now State-owned land that was not taken by ANILCA.

MOAs could readily be defined to overlay non-multiple use federal lands that are now in federal CSUs and this should be the very first step prior to expansion of any MOA or Restricted airspace.

2. Use a minimum 3,000 feet AGL base for military aircraft operating in Military Operations Areas (MOAs). The proposed 500 feet AGL would be unsafe and such restrictions would nearly eliminate the ability for exploration or for mining companies to access their claims or conduct mineral exploration using aircraft. Generally, mining companies operate their aircraft above 1000 feet AGL for safety and to minimize impacts on wildlife and other users. A 3000 foot AGL lower limit for military aircraft would provide a separation safety zone and reduce impacts on wildlife and other users.

Expansion of Fox 3 MOA to include a larger area and much lower altitudes would be a huge problem for the mineral industry. The current Fox 3 MOA primarily overlays the Alaska Range and Denali Highway from west of Tangle Lakes to near Cantwell and has a base of 5,000 feet AGL. The proposed geographic expansion would extend south to include much of the Talkeetna Mountains and east to encompass an area east of Tangle Lakes. The proposal would lower the entire expanded MOA to include the airspace down to 500 feet AGL. The expansion would encompass areas with previous mining and much of the 260 sqmi of mining claims that makeup the M.A.N. project. This project north and west of Paxson has received several \$10s of millions of exploration investment over the past 15 years and drilling continues today as this letter is being written.

The New Paxson MOA would extend east from the expanded Fox MOA to include the Richardson Highway corridor (including Isabel Pass) down to 500 feet AGL. This MOA includes much of the Alaska Range East of the Richardson Highway to approximately Mt. Kimball, including the Slate Creek (Upper Chistochina) mineral district. There is past mining in this area and there are currently several major exploration projects working here. To impose an MOA with a 500 foot AGL base would be a significant hardship for exploration and development.

The only feasible and environmentally acceptable access to most of the Fox 3 MOA and the Paxson MOA for exploration work is by helicopter and fixed wing aircraft.

3. The Special Use Airspace Information System (SUAIS) should be expanded to include the Fox 3 and proposed Paxson MOA and all other MOAs in the state.

4. Expansion of Realistic Live Ordnance Delivery (RLOD) must not be over State-owned lands. Currently these activities occur on and over federal land controlled by Department of Defense (DoD). The proposals include expanding RLOD areas onto a considerable acreage of state lands and some BLM lands not currently under DoD control. These lands are open to mining and under Alternative A include a small, active mining in the Portage Creek area in Little Delta River drainage. RLOD requires that lands included "safety controls necessary to exclude nonparticipating persons and aircraft from the WDZ when ordnance delivery training is taking place in the range training area and the associated air and ground surface areas are active". The areas would be used and the restrictions would be in place for "90 to 150" days (see page 2-10).

N0030

Under DEIS Alternative A, the area of state lands subject to these restrictions is 163,000 acres (page 3-144) located Northwest of the Oklahoma Impact Area in the Donnelly Training Area (described in the DEIS as the expansion of Restricted Area 2202 to include underlying lands). As noted above, this area includes a number of state mining claims. Under Alternative B, 234,600 acres of state land are subject to restrictions, including an almost continuous strip of state land between the Tanana Flats Training Area (R-2211) and the Donnelly Training Area Fort Greeley (R-2202). If these restrictions were in place for 90 – 150 days, they would effectively eliminate other uses of these state lands, and specifically mineral exploration and mining. If the area was closed 150 days of the year, it would be impossible to conduct exploration or mining on the claims. If a mining operation did operate in this area, it would repeatedly be forced to suspend operations and evacuate workers which would be totally impractical. The Environmental Consequences section of the DEIS (Section 3.2) does not address this impact on mining. The proposal would preclude current mining and no new mining operations would be possible on this state land. This should have been assessed in Section 3.2.10.3.1.

5. Restricted airspace corridors for Unmanned Aerial Vehicles (UAV) must not extend lower than 3,000 feet AGL. The DEIS proposes to establish corridors where non-military aircraft would be prohibited (Restricted Airspace) when they are being used for UAVs. Several of these corridors bisect, and therefore would block, corridors commonly used by small aircraft, such as a corridor between Eielson AFB and the Tanana Flats Training Area (R-2211), Fort Wainwright to R-2211, and from R-2205 (Yukon Training Area) to R-2002 (Donnelly Training Area), all of which cross both the Richardson Highway and the Tanana River southeast of Fairbanks. The Corridors from Fort Wainwright to the Yukon Training Area (R-2205) and from R-2211 to R-2202 would also impact small aircraft traveling east and southeast of Fairbanks. According to Table 2-15, the corridors would be used approximately 238 days annually (2/3 of the year) and generally between 7 AM and 7 PM, Monday through Friday. The corridors are proposed to be 5 or 8 miles wide and from 1,200 feet AGL to 17,999 feet MSL.

These corridors would directly impact mining operations such as flights from Fairbanks to the Pogo Mine and flights from Fairbanks to the Fortymile Mining District. These Restricted Areas, when active, could result in very lengthy detours, at a minimum adding significant time and costs, and in marginal weather, creating a safety hazard by forcing pilots to deviate significantly from the most direct routes and often to fly over more remote areas and higher terrain to reach their destinations.

6. The Governor of Alaska, the Alaska Congressional Delegation and the Millennium Safety Foundation should be petitioned to get the Federal Aviation Administration (FAA) to formally define “see and avoid”. A definition for what is meant by this term would eliminate the need for Restrictive airspace corridors for UAV operations. This is clearly the simplest solution for this problem.

7. Establish a 3,000 feet AGL base for the expansion of R-2205 (Yukon Training Area). This proposed expansion would establish restricted airspace from Eielson AFB to the existing restricted area R-2205 that overlies part of the Yukon Training Area. This alone would be a major problem, even if the UAV corridors were not established. The cumulative impact of the expansion of R-2205 and the proposed UAV corridors would be to restrict aircraft from traveling up and down the Tanana Valley.

8. The restricted area proposed between the training area and Fort Greeley must have a base of on not lower than 3,000 feet AGL. General aviation must have the ability to fly the road system from the Glennallen north through the Delta Junction area and on to Fairbanks without

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encountering a restricted area. Inclement weather is often present in this area, especially between Glennallen and Delta Junction and not allow pilots to fly this route is guaranteed to result in the deaths of many Alaskans when they must fly other more dangerous routes.

Thank you for the opportunity to comment on this important issue. The Alaska Miners Association supports our military (a large percentage of our members are military veterans) and recognizes the need for realistic training but this training can be accomplished as we have recommended without compromising the limited areas of this state that are still open to mineral development.

Sincerely,



Deantha Crockett
Executive Director

Cc: Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell

N0031

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0031	Rodney Arno	Executive Director	Alaska Outdoor Council	General (to the EIS), Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>ALASKA OUTDOOR COUNCIL and Alaska Fish & Wildlife Conservation Fund 310 K Street, Suite 200 Anchorage, Alaska 99501 (907) 264-6645 aoc@alaskaoutdoorcouncil.com</p> <p>July 9, 2012</p> <p>Lt. General Stephen L. Hoog Commander, Alaska Command 9480 Pease Avenue, Suite 110 JBER, AK 99506-2101</p> <p>SUBJECT: Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement DRAFT Environmental Impact Statement (DEIS)</p> <p>RE: Alaska Outdoor Council (AOC) comments on (JPARC) Modernization and Enhancement (DEIS) Dear</p> <p>Lt. General Hoog:</p> <p>As Executive Director of the Alaska Outdoor Council (AOC) I have reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement DRAFT Environmental Impact Statement (DEIS) and attended a number of public and an individual meeting hosted by very knowledgeable JPARC staff. The Alaska Outdoor Council (AOC) is a statewide organization made up of individual members and clubs that hunt, trap, fish, and recreate outdoors primarily on public lands and waters. AOC represents over 10,000 Alaskans in the regulatory process regarding access to public lands, waters, and renewable resources that they depend on. AOC, and its parent organizations, has advocated for equal access by the public to public resources in Alaska since before Alaskan Statehood was approved by the US Congress and signed into law. In the past AOC has worked cooperatively with the military regarding access within and over Military Operation Areas and weapons transfer across military lands. During the JPARC DEIS public process, AOC found the military staff involved with this project to be genuinely interested in informing the public. The willingness to extend the original comment period deadline is an example of how JPARC was making sure all Alaskans who may feel they could be impacted by the expansion of military training operations could have their concerns addressed. AOC thanks you for the extra time to comments and the additional information we received on the DEIS.</p>

N0031

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AOC offers the following comments regarding Subsistence Resources as they relate to proposed action #1. Fox 3 MOA Expansion and New Paxson MOA:

- The DEIS violates Title VIII of ANILCA by using race as a factor to determine dependence of federally qualified communities who hunt, trap, fish, and gather vegetation within the Fox 3 MOA and newly proposed Paxson MOA. The history of ANILCA clearly states a position of race neutrality regarding a priority to public resources. An evaluation of possible restrictions on subsistence uses by all federally qualified communities is required by ANILCA 810(a), not just the villages selected in Table 3-24.
- The DEIS fails to consider adverse impacts on subsistence uses of thousands of Alaskans (average 3,500 licensed hunters annually) who qualify under AS 16.05.258 as subsistence users on State and private lands in the Fox 3 MOA (GMU 13B - 1,428,519 acres of State land, 28,917 acres of private lands. GMU 13A - 2,519,061 acres of State land, 152,282 acres of private land) and newly proposed Paxson MOA (788,082 acres of State land, 330,927 acres of private lands). State and private lands are by far the major land owners under the Fox 3 MOA and proposed Paxson MOA.
- The DEIS fails to report Alaskan resident hunter participation in GMU 13. 5,015 hunters reported hunting moose in GMU 13 in 2010. 4,887 hunters reported hunting Neichina caribou in 2010, ADF&G harvest data. The population of individual Alaskans living in subsistence communities in the vicinity of the proposed expansion of MOA (Table 3-24, JPARC DEIS) total 1,506 Alaskan residents. The final ROD on the JPARC Modernization and Enhancement should account for impacts to all subsistence users under both federal, ANILCA Title VIII and State subsistence laws, AS 16.05.258, not just the 1,506 subsistence users listed in JPARC DEIS Table 3-24. AOC offers the following comments regarding Biological Resources as they relate to proposed action #1. Fox 3 MOA Expansion and New Paxson MOA:

N0031

<p>N0031</p>	<p> <ul style="list-style-type: none"> Biological resources are currently being managed for an abundant harvestable surplus of moose and caribou by ADF&G. The availability of moose and caribou directly impacts thousands of Alaskan families who choose to make gathering a wildfood harvest part of their sustenance. Fox 3 MOA and the proposed expansion plus the newly created Paxson MOA is airspace over one of the few areas in Alaska where predator/prey management under State law, AS 16.05.255(e) – (g), can be successfully conducted. The final ROD on the JPARC Modernization and Enhancement proposed action #1, Fox 3 MOA Expansion and New Paxson MOA should take into consideration the fact that biological resource enhancement programs are not allowed by federal land managers in the vicinity of the proposed action. Federal land managers continue to reduce the areas where the State may conduct predator/prey management, which makes any adverse impact on biological resources where the state can still manage for abundant harvest that much more of value to Alaskans. <p>The expansion of Fox 3 MOA and the addition of the proposed Paxson MOA in combination with the lowering of the AGL down to 500 feet has the potential to negatively impact a large number of Alaskans who hunt, trap, fish, and recreate via snowmachine, ATV, boat, or aircraft throughout the year in the proposed area. AOC does not want to see folk's use of public resources on public lands underlying this proposed action diminished by proposed military activities. AOC strongly supports the militaries presents in Alaska and hopes to work toward continuing our public access to lands under MOAs.</p> <p>Sincerely, Rod Arno Executive Director, Alaska Outdoor Council (907) 841-6849</p> </p>
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N0032

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

July 3, 2012

Dear Madam or Sir:

The Fairbanks International Airport Operators Council (AOC) is comprised of managers, directors, and owners of businesses and organizations conducting business at Fairbanks International Airport and in the Fairbanks aviation community. The AOC consortium includes representatives from airline and regional air carriers, ground handling services, commuter and air taxi services, local tour companies and advocates for interests in the private aviation community. We have participated in the JPARC public meetings held in Fairbanks, and based on our analysis of the Draft EIS document, would like to comments concerning the proposals.

Economic impact of the airport on Fairbanks and Fairbanks North Star Borough is significant. As second busiest passenger airport in the state, the airport serves as a hub for more than 50 communities in northern Alaska, with an estimated expenditure of \$261 million annually in wages, capital and operating expenses. It is an economic engine for the community and the state, resulting in over 2,000 jobs, primarily in the Fairbanks North Star Borough, according to a State of Alaska study conducted by Northern Economics. The ability to maintain, or grow this engine, is directly impacted by the ability of air traffic to reach the airport thorough surrounding airspace. Given this back ground, several proposed changes to airspace described in the JPARC Draft EIS are of concern.

IFR Access to MOAs

The FAA is working to expand and enhance the IFR infrastructure in Alaska. GPS based IFR routes are being developed, and access to rural communities is being enhanced with the addition of WAAS approaches. We have already seen impacts with the recent implementation of the Delta MOAs, which block V-444 between Fairbanks, Delta Junction and communities to the south and east. Additions to MOA airspace, specifically by the proposed Paxson MOA, would further limit IFR access, when active. This is directly in conflict with the efforts to improve safety and access thorough expanding IFR infrastructure. It is essential to develop procedures between the FAA and the military, to provide real-time IFR access to MOAs, at least for limited flight altitudes, to assure routine IFR access between Fairbanks and the surrounding communities. This not only impacts the air taxi or small commuter operators that provide service, but it also impacts the larger air carriers that those commuter flights need to connect with to efficiently move passengers and cargo to more distant locations inside and outside the state. No additional MOA airspace should be established without provisions for real-time IFR access.

N0032

UAV Corridors

The JPARC proposes establishment of corridors for UAV access to restricted areas south and east of Fairbanks, including the use of Restricted Airspace to establish these corridors. Restricting airspace across important civil traffic corridors (including IFR airways), has a direct negative impact on access to Fairbanks International Airport. Other means that do not include segregated airspace must be found that do not restrict access, or compromise safety, with civil aviation arriving or departing from Fairbanks International Airport.

Restricted Areas

Several proposals seek to add restricted airspace south and east of Fairbanks. The Realistic Live Ordinance Delivery has an alternative that would link the existing Restricted Areas 2211 and 2202, forming a barrier to civil traffic headed into the Alaska Range from Fairbanks, Delta Junction and the Richardson Highway corridor. We opposed restricting that access to mining, hunting and recreational areas in the Alaska Range. Similarly, the proposal to establish restricted airspace over the Battle Area Complex near Delta Junction also impacts access to Isabel Pass, a major civil aviation corridor between the interior and south central Alaska. Restricting access to these areas again has an impact as many of these flights either depart from or arrive at Fairbanks International Airport.

F-16 Relocation

Not addressed in the JPARC Draft EIS is the recently proposed relocation of the F-16 aircraft based at Eielson to Joint Base Elmendorf Richardson (JBER). This change would undoubtedly impact the already very busy airspace in the Anchorage area, including Anchorage International Airport. Fairbanks and Anchorage airports are part of a system. We would like to see an analysis of this proposal, to understand the potential impacts of the planned F-16 move on the JPARC proposals.

We recognize the value of military training, and understand these activities can have a positive impact on the Fairbanks area. Our interest is in working with the military and FAA to identify mitigations that allow this training to continue, without negatively impacting the activities at Fairbanks International Airport.

Sincerely,



Cory Christian, President
FAI Airport Operators Council



JPARC Page 2

N0033



June 7, 2012

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

JBER, AK 99506

To Whom it May Concern,

Ahtna Incorporated is supportive of the military's effort to enhance and upgrade the military's technological capabilities and weaponry for combat preparation. We appreciate and honor all of the servicemen and women who serve our country. Our Ahtna People have and continue to proudly serve in the military. We are proud of our armed forces, and indebted to them. Unfortunately, Ahtna Incorporated has some concerns with the preliminary JPARC Environmental Impact Statement.

Section 3.1.9 Cultural Resources page 3-53: In Appendix B Definition of the Resources and Regulatory Setting, section B.9 the definition is given as follows: Cultural resources are prehistoric and historic sites, buildings, districts, or objects that are important to a culture or community for scientific, traditional, religious or other purposes. Cultural resources are generally divided into six categories: archeological resources, architectural resources, traditional cultural properties, cultural landscapes, National Historic Landmarks, and National Monuments.

Traditional cultural properties are properties, sites, or other resources associated with the cultural practices and beliefs of a living community that link the community to the past and help maintain its cultural identity and are listed or eligible for listing on the National Register. Traditional cultural resources are areas associated with the cultural practices and beliefs of a living community that link the community to its past and help maintain its cultural identity that have not been evaluated for National Register eligibility. Sacred sites are well-known areas associated with cultural practices or beliefs of a living community. Most traditional cultural properties, resources, or sacred sites in Alaska are associated with Alaska Natives. Traditional cultural properties or resources can include archeological resources, locations of prehistoric or historic events, sacred areas, sources of raw materials used in manufacture of tools and sacred objects, certain plants, or traditional hunting and gathering areas. Both historic properties and significant traditional resources identified by Alaska Natives are evaluated for potential adverse impacts of action.

On page 3-50, under the title Traditional Cultural Properties and Alaska Native Concern, there is the following statement: **There are no Alaska Native tribes within this area**, but there



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are scattered remote residences. **There are no properties of traditional religious and cultural importance known to be located within the area. This needs to be corrected.**

Ahtna Incorporated is one of the 13 Alaskan regional Native corporations. The Ahtna traditional territory stretches from Cantwell across the Alaska Range through Paxson to the Mentasta Mountains. The territory continues south through the Susitna River headwaters to the Chugiak Mountains, east to the Wrangell Mountains, and west to the Talkeetna Mountains. The territory encompasses the entire length to the Copper River from the headwaters to Woods Canyon south of Chitina (Attachment A). The Ahtna people have used and occupied this land for 5000 to 7000 years (USDA –NRCS 1999). **Department of Defense Instruction number 4710.02 Enclosure 2 section E2.1 states “As tribal boundaries have shifted and tribes have migrated, tribes that seem far removed geographically may have a traditional interest in assets and action at specific, present day installations.”** The entire proposed Fox 3 MOA expansion lies entirely within the Ahtna people’s traditional territory. The majority of the proposed Paxson MOA lies within this territory as well (Kari 2010).

Ahtna Incorporated is comprised of eight villages: Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina. Each of these villages has a village council which is recognized as its own tribe by the United States government. Each of these villages was contacted by letter, by the United States Air force through the Alaska Command (ALCOM) concerning the JPARC proposal. The ALCOM has also had two meetings with Ahtna Incorporated in regards to the JPARC proposal.

Paragraph 4 section 3.1.9.31 Environmental Consequences Alternative A states: In compliance with Section 106 of the National Historic Preservation Act (NHPA), ALCOM, on behalf of the Air Force, has completed consultation with the Alaska State Historic Preservation Office (SHPO) and determined that no historic properties will be affected by implementation of the proposed action. Consultation with potentially affected Alaska Native tribes, Alaska Native Claims Settlement Act (ANSCA) corporations, and Tribal government entities regarding ALCOM’s finding of no historic properties affected is ongoing. In accordance with AFI 32-7065, all NHPA Section 106 consultation will be completed, unless circumstances prevent it, prior to finalizing the EIS and signing the ROD. **By your own words and actions in this section you acknowledge the Ahtna tribes in the region.**

Under ANSCA section 14 (h) (1) Regional Native Corporations have the right to receive title from the federal government to existing cemetery sites and historical places. Currently, Ahtna has on file with BLM ten applications for 14 (h) (1) sites within the Fox 3 MOA expansion area. All ten sites have been examined by a Bureau of Indian Affairs (BIA) archeologist and each site received a Certificate of Eligibility. Ahtna Incorporated hopes the protection of the Tangle Lakes Archeological District (VanderHock 2011) is also taken into account. It appears to be a logical conclusion that air traffic and sonic booms should not have a significant impact on these sites. **The fact remains that these sites need to be acknowledged in your report.**

Section 3.1.8 Biological Resources page 3-38: Under section 3.1.8.1 Affected Environment, the vegetation cover is described as: shrub communities of willow (*Salix* spp.), birch (*Betula* spp.), and alder (*Alnus* spp.) occupy lower slopes and valley bottoms. Forests are rare and

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confined to low-elevation drainages (Nowacki 1995). The Copper River Basin ecoregion, which underlies the southwestern portion of the expanded Fox 3 MOA and proposed Paxson MOA, is a large wetland complex underlain by thin to moderate thick permafrost and pockmarked with thaw lakes and ponds. A mix of low shrubs and black spruce (*Picea mariana*) forests and woodlands grows in the wet organic soils. Cottonwood (*Populus* spp.), willow, and alder line rivers and streams as they braid or meander across the basin.

The paper cited in this paragraph by Nowacki is not listed in your references. A Google search of the authors name provided contact information at the USDA Forest Service. Personal correspondence with Mr. Nowacki revealed that the paper cited was an earlier version of an effort to map the ecosystems of Alaska. The newest version was published in 2003. It is a combined effort of the National Park Service, USDA Forest Service, U.S. Geological Survey, and Alaska Biological Research, Inc.

According to this paper, the Fox 3 MOA, the Fox 3 MOA expansion, and the proposed Paxson MOA lie within the Alaska Range Transitional Division (Spencer *et al*, 2003). The description given of this area is "boreal forests distributed in the valleys and lowlands of the division, but wildfire and permafrost have much influence on vegetation. Soils in the mountainous units of the Alaska Range and Lime Hills are generally thin, rocky, and cold, with scattered pockets of permafrost. The Copper Basin floor is formed of interleaved lacustrine deposits, glacial material, and volcanic debris that form fine-grained saturated soils with ice-rich permafrost. The basin support Boreal vegetation patterns, with white spruce and birch on higher ground and black spruce, low shrubs, sedges and mosses growing in wetlands. White spruce and balsam poplar form successional stands along the rivers. The lower slopes of the Talkeetna Mountains are cover with dense thickets of alder that transition to low shrubs in the sub-alpine and blueberry rich alpine tundra. Vegetation of all types succumbs to the harsh conditions at about 4000 feet, leaving the higher area to bare rock, talus (broken loose bedrock), and ice."

The soil surveys for the Copper River area, the Gulkana River describe the cover type as boreal forest. Species composition in boreal forest is determined by wildfire frequency. Wildfire frequency, intensity, and distribution create a mosaic of species across the landscape (USDA 1991). The Soils of the Gulkana Area list 47 different forest cover types (Clark and Kautz 1999). The Soils of the Copper River Area list five forest cover types: black spruce, white spruce-quaking aspen, white spruce-paper birch, white spruce-quaking aspen-balsam poplar, and white spruce-black spruce (USDA 1999). White spruce, aspen, and balsam poplar grow on soils with no permafrost (National Park Service 2012). **The area of the Fox 3 MOA expansion and the new Paxson MOA is an incredibly rich and varied ecosystem and not just black spruce and wetlands. This ecosystem supports Ahtna's year round subsistence resources.**

Boreal forests are a wildfire ecosystem. The largest wildfires in acreage are cause by lightning strikes, while most small acreage fires are human caused. Wildfires create a mosaic of vegetation types across the landscape of different stages of succession (Johnson *et al*. 2001). Fuel moisture and fuel load are the two largest factors determining fire intensity (Ross *et al*. 2001). The boreal forest contained in the proposed Fox 3 MOA expansion and Paxson MOA are particularly prone to intense wildfires. In the 1990's there was an intense spruce beetle, *Dendroctonus rufipennis*, infestation. Several million acres of spruce trees were killed in this

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decade long outbreak. The Copper River Basin was one of the areas heavily impacted by this infestation. There are still many tens of thousands of beetle killed, standing dead trees within the Copper River Basin (USDA 1997). These standing dead trees are susceptible to torching, where the fire quickly travels up the stem of the tree to the crown. If the wind is blowing the fire can quickly spread to neighboring live trees (USDA 2001).

Much of the proposed areas have forest cover types of 1) white spruce, *Picea glauca*, 2) mixed white spruce/ black spruce, *Picea mariana*, and 3) black spruce cover type (USDA 1999). These forest types are especially vulnerable to wildfire. This is because of the low moisture content of the leaves compared to deciduous tree, and the presence of dead retained lower branches that is conducive to torching. Black spruce is particularly highly flammable (Chapin et al. 2008).

Finally, heavy wildfire suppression since the 1950 has resulted to excessive fuel loads in the boreal forest. Fire suppression has increased landscape flammability. This is of particular concern because of climate shift in the last decade due to global warming. This volatility is of great concern around local communities (Chapin et al 2008).

The use of the Chaff & Flare defensive flares over the boreal forest is a great concern to Ahtna Incorporated. In **Chapter 3.0 Affected Environment and Environmental Consequence** it is stated that 1) there will be altitude restrictions of 5000 feet AGL from June through September, and 2000 feet AGL for the rest of the year. 2) It also states that the defensive flare is composed of small pellets of highly flammable material that burn rapidly at extremely high temperatures. It burns completely within approximately 3.5 seconds, or approximately 400 to 500 feet from the release point. **There are no independent studies to measure the chance of igniting a wildfire in this highly flammable landscape. What measures will the Air force take to ensure that a wild fire will not be ignited? What measures will the Air Force take if they do ignite a wildfire? Who will be responsible for putting the wildfire out? State and Federal agencies will not suppress fires in areas with possible live ordinance present. One of the papers in your references section (Air Force 1997) Use of flares will be suspended when warranted by the fire condition code. Who determines the fire conditions?**

In the **environmental consequences section 3.1.8.3.1** there is a discussion on chaff and flare use. It says “extensive studies of chaff particles and defensive flare constituents have found no negative impacts on biological resources. There is nothing cited here. You can’t make a statement like that and not back it up. A study was located in the references (Air Force 1997). The Air Force study says that fire danger assessment will be addressed by using BEHAVE, a predictive fire model. Then the paper goes on to say “Although the study examined fire history data from various locations for correlations between level of flare use, method of flare employment, environmental conditions, and fire occurrence, no correlation could be derived at a statistically valid level.” **In short, the Air Force has no idea how chaff and flare will affect the probability of starting a wild fire. There are no independent studies of chaff and flare devices cited.**

The Environmental Effects of Self-Protection Chaff and Flare Final Report states “information from range personnel and investigative reports for specific fires indicates that fire

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from flares have occurred, even in areas where minimum release altitude is 5000 feet AGL. Specifically, one fire in Meadow Valley, which burned 21,600 acres in 1993, was attributed to flare use according to a BLM fire investigator.”

The Alaska Interagency Fire Management plan (1987) provides for a natural fire regime in unit 13 for the purpose of wildlife habitat enhancement. This plan provides for small scale fires in the area. Caribou will not return to a burn area for 50 years. It is important to create a mosaic of landscape types for optimum wildlife habitat (Schwanke 2010). Ahtna Incorporated feels that the possibility of chaff & flare cause wild fires will disrupt this management plan. The Air Force’s own report supports the fact that chaff and flare can trigger large acreage fires.

Section 3.1.8.1 Continued. The EIS acknowledges the fact that “caribou habitat underlies most of the airspace, with summer range and calving habitat underlying the central and western parts of the airspace and winter habitat under both the eastern and western portions.” **This is not just “caribou habitat”. This is the Nelchina Caribou Herd range.**

The Nelchina Caribou herd (NCH) population fluctuates between 35,000 to 40,000 animals. It has a migratory range that stretches from north of Tok on the Eagle highway to their calving grounds north of Eureka and west of Lake Louise. After the calving season they disperse throughout Unit 13, and conversely throughout most of the proposed Fox 3 MOA expansion, and the proposed Paxson MOA. This is the most road and off road vehicle accessible caribou herd in Alaska. People from Kenai, Soldotna, Anchorage, Wasilla, Palmer, Chickaloon, Sutton, Eureka, Mendotna, Tolsona, Glenallen, Valdez, Chitina, McCarthy, Copper Center, Tazlina, Glennallen, Gulkana, Gakona, Sourdough, Paxson, Delta, Chistochina, Mentasta, Tok, Tetlin, Dot Lake, Healy Lake and Tanacross depend on this herd for sustenance (Alaska Division of Fish & Game (ADFG), 2008). Harvest records from 1998 to 2010 show an average of 3,023 animals are harvested from this herd annually. There are four years that the harvest was between 4,500 and 5,800 caribou harvested (Schwanke, 2010). ADFG manages the herd to supply from 2000 to 4000 animals a year (ADFG 2008). **In 1997 there were 13,612 hunters registered for the Tier 1 hunt of the NCH. In 1996 there were 19,397 registered hunters (Fall & Simeone 2010). Though these numbers reflect the peak number of hunters since 1990, they do demonstrate the intense hunting pressures the NCH is under.**

The NCH has been intensely managed by ADFG since the 1950’s. The management objective is to maintain the herd population from 35,000 to 40,000 animals. The ratio between bull to cow management objective is 40 bulls to 100 cows. The tools that ADFG use to manage for these objectives are 1) annual population counts by fixed wing aircraft and helicopter, 2) an active wolf control program, and 3) harvest quotas from several state and federal hunts, and the Ahtna Community Hunt (ADFG 2008). Limiting the flights into game unit 13 will reduce the ability to accurately assess population numbers of the NCH. **This will lower the available caribou for annual harvest, as ADFG will have to be more conservative in order to ensure management objectives (Schwanke 2012).**

Section 3.1.8.3.1 Environmental Consequences Alternative A: In this section it is stated that: Wildlife species would be exposed to over flight by military aircraft flying as low as 500 feet above ground level (AGL), potentially causing altered behavior or metabolic effects. Additionally,

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high speed maneuvers within the proposed air space would create sonic booms, and training would incorporate use of chaff & flares, as defensive measures. Behavioral responses to over flights of 500 feet AGL and above are generally characterized for wildlife species, including various ungulate species, as minor and include individuals assuming an alert posture, rising, walking, or running short distances. Few studies have evaluated the effect of military over flights on moose; several have studied the effect on caribou.”

The paper cited as to behavioral responses to over flights (Lawler *et al.* 2005) only studies the short term effect on caribou by over flights and sonic booms of A-10, F-15, and F-16 aircraft. **There is no study cited about over flights and sonic booms of the F-22 and F-35 aircrafts.** Additionally, another paper cited about the short term effects on caribou (Manci *et al.* 1988) states that “escape and strong panic reactions were observed in 65 to 75% of all groups to over flights of fixed wing aircraft up to 500 feet AGL. Groups consisting primarily of cows, calves and yearlings tended to show a stronger response to the aircraft than groups of bulls.” The paper goes on to state that **“Little is known of the long term effect of noise on the physiology of wild ungulates.”**

Other studies have been undertaken to understand caribou responses to human disturbances. Wolfe *et al.* in 2000 reports that **“Individuals and groups of caribou move away from point sources of disturbance, increase activity and energy expenditure near disturbance, and shift away from areas of extensive and intensive development.”** Cameron *et al.* in 1992 report that **caribou herds on the North Slope of Alaska shifted their calving grounds in response to oil field development.** Initially the caribou chose to calf near the coast where predators were few. As development increased they shifted the calving ground away from the development. The area the caribou now calf in has increased predation pressure on the calves. Whitten 2001 reported to the House Committee on Resources that **caribou calving areas are considered to be critical habitats.** Oil development of the Arctic National Wildlife Refuge was halted because the primary area sought for development lay within the calving grounds of the Porcupine Caribou herd. “This large, migratory herd moves between the U.S. and Canada and is vital to the **traditional subsistence cultures of numerous Native villages in both countries.**” ADFG 2008 reported that **the Delta Caribou herd moved their calving grounds from north of the Alaska Range (pre-Fox 3 MOA) to south of the Alaska Range (post-Fox 3 MOA).** **“No information was found in the literature describing startle effects of chaff on wildlife” (Air Force 1997).**

Discussion of the noise levels created by the sonic booms is addressed in Section 3.1.2.3.1 **Noise Environment Consequences Alternative A:** All subdivisions of the proposed Fox 3 MOA as well as the new Paxson MOA would have an established minimum flight altitude at 500 feet AGL. Subsonic aircraft noise levels beneath the Paxson MOA/ATCCAA would increase from 37 to 54 dB Ldnmr. Noise levels beneath all subunits of the expanded Fox 3 MOA would increase from 39 dB Ldnmr to 54 dB Ldnmr. Air craft would fly at lower altitudes as a result of “floor: altitude decrease. Decreasing altitudes would result in increased individual over flight noise events.”

The definition of what dB Ldnmr is lacking in this draft EIS. Consulting the Eglin Air Force Base EIS (Appendix E Noise) gives this definition: **Onset-rate Adjusted Monthly Day-Night Average Sound Level.** This average decibel calculation is worthless when taking into account 500 foot AGL over flights with accompanying sonic booms. Caribou do not care about averages. The

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in the moment experience is what will cause the startle reaction in caribou. An F-15 aircraft creates a sonic boom of 3.92 pounds per square foot and 139.6 decibels at 100 feet AGL (Hamby 2004). An internet search of various blog sites from around Air Force bases deploying F-35s say that its sonic boom is much, much louder than an F-15. They all ask the same question: What is the decibel level of the sonic boom for an F-22 and F-35? The Air Force has not published what the sonic boom decibel level for F-22 and F-35 aircraft is. **Ahtna Incorporated would like to know what the decibel levels of the sonic booms created by these aircraft at 500 feet AGL, at 1000 feet AGL, at 2000 feet AGL, and at 5000 feet AGL.**

Section 3.1.13.2 Subsistence Impact Assessment Methodology: Your assessment methodology is inadequate in at least 3 ways. **First, limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area.** Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances in order to put food on the table and fill the freezer. The analysis should be expanded to incorporate the Alaska Board of Game Findings (Attachment B) along with those communities with a positive Customary and Traditional (C & T) use determination under the Federal Subsistence Program for moose, caribou or both on lands within the proposed Fox 3 expansion and Paxson MOA as discussed in the EIS. Both the Board of Game Findings and the C & T determinations are based on analysis of all available data regarding patterns of resource use, and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule.

Second, 20-plus year old community harvest data is woefully inadequate for making decisions that affect people's livelihoods. For example, in the 1980s, when many of those studies were done, Copper Basin residents could harvest caribou in Unit 11. That area is now closed to the harvest of caribou, due to conservation concerns. There is increased reliance on caribou hunting opportunities in Unit 13, which underlies the proposed Fox 3 MOA expansion and Paxson MOA. To people familiar with this data, the "most representative year" referred to in the analysis is identifiable as the most recent year for which a comprehensive subsistence survey data are available. JPARC should follow the lead of the Alaska Gas Line Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support updated surveys as needed.

As a first step, the list of potentially affected communities (as discussed above) should be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected communities that are five or more years out from the most recent update and are not on the list for an update, funding should go to the Alaska Department of Fish & Game Subsistence Division, or a similarly qualified independent organization to collect this information. **A decision on the project should be delayed until up to date subsistence information for the potentially affected communities can be incorporated into the subsistence impact assessment.**

Third, limiting the communities with high dependence on subsistence to only those with a majority (>50%) Alaska Native population fails to recognize patterns of residence by the Ahtna

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people in the Copper Basin communities, or the importance of subsistence to other local residents. While it is appropriate for predominantly Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Indeed, some of the Ahtna villages with federally recognized tribal governments were excluded from the “high dependence” category because the percentage of Alaska Native residents, while significant, does not reach the 50% level. Once up to date information is obtained regarding harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all potentially affected communities. **Communities in which 80% or more of households reporting using subsistence resources should be classified as “high dependence” regardless of community composition.**

ADFG Board of Game Findings #2006-170-BOG has established Ahtna’s Customary and Traditional Use rights in Game Management 13 for Moose and Caribou regardless of village affiliation or proximity to a money economy. Customary and Tradition uses of moose and caribou in Game Management Units 11, 12, and 13 are administered the ADFG Community Hunt (Attachments C & D). **This entire section needs to be re-examined using the correct sources for your assessment.**

Although the ANILCA section 810 analysis is mentioned, it is not completed. Issues that need to be addressed are 1) **The effect of use, occupancy, or disposition on subsistence uses and needs,** 2) **The availability of other lands for the purpose sought to be achieved,** 3) **Cumulative effects resulting in reductions in the availability of resources used in subsistence purposes, caused by alteration of their normal locations, migration, and distribution patterns.** Please refer to comments on sections 3.1.8.3.1 and 3.1.2.3.1 when completing the 810 analysis. **A new section that systematically analyses the impact of the proposed actions regarding the expanded Fox 3 MOA & Paxson MOA on subsistence resources needs to be added to the EIS.**

Ahtna Incorporated feels strongly that the proposed Fox 3 MOA expansion and proposed new Paxson MOA would have adverse effects on our Customary and Traditional Subsistence uses in these areas. Ahtna feels the proposed mitigation measures in the EIS are inadequate.

Government to Government Consultation: Executive Order (EO) 13175 November 9, 2000: There several mandates in this EO that have not been adequately addressed.

- 1) Section 1 Definitions (a): ‘Policies that have tribal implications’ refers to regulations, legislative comments or proposed legislation, and other policy statements or actions **that have substantial direct effects on one or more Indian Tribes.**
- 2) Section 1 Definitions (b): ‘Indian Tribe’ means an Indian of Alaska Native Tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to the **Federally Recognized Tribe List Act of 1994. 25 U.S.C. 479a.**
- 3) Section 2 Fundamental Principles (a): The United States has a **unique legal relationship with Indian tribe governments as set forth in the Constitution or the United States, treaties, statutes, Executive Orders, and court decisions. Since the formation of the Union, the United States has recognized Indian Tribes as domestic dependent nations**

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under its protection. The Federal Government has enacted numerous statutes and promulgated regulations that establish a trust relationship with Indian tribes.

- 4) Section 2 Fundamental Principles (b): **Indian tribes exercise inherent sovereign powers over their member and territories.**
- 5) Section 3 Policy Making Criteria (a): **Agencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights; and strive to meet responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments.**
- 6) Section 5 Consultation (a): **Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications.**
- 7) Section 5 Consultation (b)(2)(B): To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications and that preempts tribal law unless the agency, prior to formal promulgation of the regulation,
 - a. **consulted with tribal officials early in the process of developing the proposed regulation.**
 - b. In a separately identified portion of the preamble to the regulation as it is to be issued in the Federal Register, **provides the Director of the OMB a tribal summary impact statement, which consists of a description of the extent of the agencies prior consultation with tribal officials, a summary of the nature of their concerns and the agency's position supporting the need to issue the regulation, and a statement of the extent to which the concerns of the tribal officials have been met.**

To date, the only contact from the Department of Defense to the tribes of Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina has been a form letter to only some of these tribes. There were also two meetings with Ahtna Incorporated. The first meeting was approximately forty five minutes long. The second meeting was approximately one and a half hours in length. **Ahtna Incorporated feels that there is a long way to go in meeting the obligations set forth in Executive Order 13175 in regards to Government to Government Consultation. Where is the tribal summary impact statement?**

Department of Defense Instruction Number 4710.02 DoD Interactions with Federally Recognized Tribes: There are several instructions set forth in this document that Ahtna Incorporated believes have not been adequately addressed.

- 1) Section 6.1 Procedures: The DoD Components shall consult with tribes whenever proposing an action **that may have the potential to significantly affect protected tribal resources, tribal rights or tribal lands.**
- 2) Section 6.3 Procedures: Consultation required by paragraphs 6.1 and 6.2 shall apply to proposed actions **that may have the potential to significantly affect tribes, including, but not limited to: land disturbing activities, construction, training, over-flights, management of properties of traditional religious and cultural importance, protection of sacred sites from vandalism and other damage, access to sacred sites, access to treaty**

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reserved resources, disposition of cultural items in accordance with reference (k), and land use decisions.

- 3) Section 6.4 Procedures: The DoD Components shall afford tribes that have a cultural or historical affiliation with the lands encompassed by the installation an opportunity to consult on the development of the Integrated Cultural Resources Management Plan (ICRMP), and where tribal treaty rights or other rights to natural resources potentially may be affected, Integrated Natural Resources Management Plans (INRMPs).
- 4) The DoD Components shall involve tribal governments early in the planning process for proposed actions that may have the potential to affect protected tribal rights, land, or resources, and shall endeavor to complete consultations prior to implementation of the proposed action. Early involvement means that the tribal government is given an opportunity to comment on a proposed action in time for the tribal government to provide meaningful comments that may affect the decision. Installations should take advantage of the processes put forth in 40 CFR parts 1500-1508 to involve tribes in early planning.

Where is the INRMP? A form letter to some of the affected tribes, and two short meetings with the Regional Native Corporation does not constitute Government to Government consultation.

In summary, Ahtna cannot support the proposed Fox 3 MOA expansion and proposed Paxson MOA for both alternative A and B. **Ahtna Incorporated can only support the No Action Alternative.** Ahtna Incorporated feels that there was a minimal amount of effort put towards the completion of this EIS.

- 1) The areas encompassed by the proposed action contain the traditional territories of the Ahtna Peoples.
- 2) This area is an incredibly rich ecosystem that supports the year round Customary and Traditional use of subsistence resources.
- 3) There are no studies completed concerning the possibility of wild fire ignition by the use of chaff and flare.
- 4) There is no plan in place to deal with a wildfire ignited by chaff & flare.
- 5) Caribou will not return to a burned area for 50 years.
- 6) The areas contained in the proposed Fox 3 MOA expansion and the proposed Paxson MOA contain the summer and fall ranges of the Nelchina Caribou Herd (NCH). This includes the calving ground of the NCH. Calving grounds are considered critical habitat. Ahtna feels that the Air Force has not dealt with this issue adequately.
- 7) The literature cited in this EIS concerning the effect of caribou to over flights, sonic booms, and chaff and flare deployment is lacking and incomplete. Ahtna feels that only literature supporting the proposed action is cited. The Air Force has reported that there is no literature on the effects of chaff & flare on wildlife. A complete literature review needs to be included in this EIS. Several studies of other caribou herds in Alaska show that caribou will choose avoidance when faced with development or human interaction. Ahtna feels the NCH will also choose avoidance in response to the proposed action. This will severely impact the Customary and Traditional Subsistence uses in these areas.

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- 8) The NCH already faces incredible hunting pressure. ADFG has intensely managed this herd for over 50 years to provide an annual harvest of up to 3000 animals. Air space restrictions will inhibit ADFG's ability to accurately assess herd populations. This will result in smaller harvest quotas, as ADFG will have to be more conservative to meet management objectives.
- 9) Startle response of caribou has been discussed. The decibel of the sonic boom of the F-22 and F-35 has not been discussed. The averaging of day and night sound levels is not adequate to describe what the caribou will experience when the F-22s and F-35s fly over them at 500 feet AGL. Ahtna specifically wants to know what the sonic boom decibel level will be at 500 feet AGL, 1000 feet AGL, 2000 feet AGL and 5000 feet AGL for all aircraft type proposed to use this airspace.
- 10) The extensive studies of chaff particles and defensive flare constituents need to be disclosed. The studies were mentioned in the EIS but nothing was cited. Only one paper was in the reference section.
- 11) The Subsistence Assessment Section needs to be totally rewritten using relevant source documents, specifically the ADFG Board of Game Findings #2006-170 BOG. The Federal Subsistence Program customary and traditional use determinations, and ADFG BOG Findings #2006-170-BOG have already set the criteria for subsistence uses in the Copper River Basin. The Air Force has no right to create their own criteria, and then state that there will be no substantial impact to subsistence uses.
- 12) An 810 analysis has not been completed. . . Issues that need to be addressed are 1) The effect of use, occupancy, or disposition on subsistence uses and needs, 2) The availability of other lands for the purpose sought to be achieved, 3) Cumulative effects resulting in reductions in the availability of resources used in subsistence purposes, caused by alteration of their normal locations, migration, and distribution patterns.
- 13) Ahtna Incorporated feels the Air Force has not completed their obligation of Government to Government consultation in this matter as mandated by Executive Order 13175 and the Department of Defense Instruction number 4710.02. Ahtna also feels that the two meetings with Ahtna will be used to show that they accomplished this obligation. Ahtna Incorporated is the Regional Native Corporation, not a tribal entity. The Air Force needs to implement face to face meetings with all eight Ahtna villages to satisfy this obligation. Sending a form letter, and stating there was no reply, does not satisfy the obligations.
- 14) There is no Integrated Natural Resource Management Plan as required by Department of Defense Instruction number 4710.02.

Ahtna Incorporated feels that there are not enough studies done on long term effects of over flights, sonic booms, and chaff & flare deployment to ensure that unfavorable impact to subsistence uses in the Ahtna Region does not occur. The Air Force has not included other areas in Alaska where the proposed maneuvers can take place in the EIS. Ahtna Incorporated feels that these maneuvers should be done somewhere else where the impacts can be studied long term. Only after long term studies can be accessed could Ahtna Incorporated approve of these new and expanded MOAs.

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Thank You,



Kathryn Martin

Vice President of Land & Resources

Ahtna Incorporated

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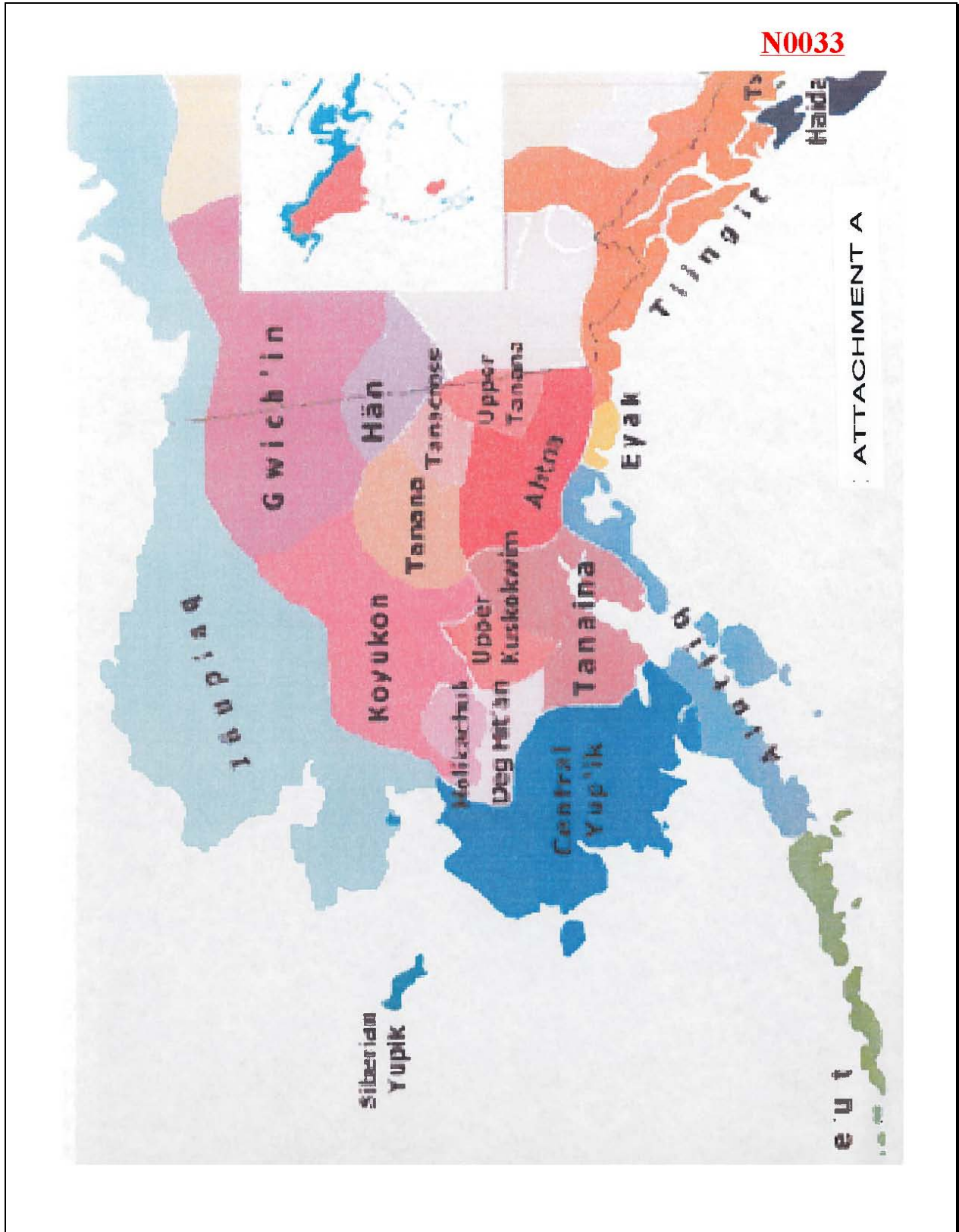
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N0033**ATTACHMENT B****Findings for the Alaska Board of Game
#2006 – 170 - BOG****Game Management Unit 13
Caribou and Moose Subsistence Uses****Background**

Virtually since its inception, the Tier II subsistence permit system has been plagued with public complaints about inequities, unfairness, and false applications. Over the years, the Alaska Board of Game (Board) has amended its regulations numerous times to try to address management and legal problems, but the controversy continues and the system remains rife with problems. Public complaints have been primarily directed at the Tier II permitting system—particularly those near urban areas like the Minto moose hunt and the Nelchina Tier II caribou hunt.

The Board has primarily focused on the Nelchina basin caribou and moose hunts because these have generated the vast majority of the interest and complaints from the general public. In addition, Board members are concerned the hunting patterns no longer meet the Board's intent when these subsistence hunts were originally established in regulation. A review of these hunts question whether the current hunts are consistent with the Board's customary and traditional use findings based on the eight criteria the Joint Boards of Fish and Game established (5 AAC 99.010) for implementing the state subsistence law (AS 16.05.258(a)).

Statistics associated with the Nelchina caribou hunt illustrate some troubling trends. Permits have been slowly shifting away from local Alaskan residents the Board identified as the most dependent on the wildlife resources in the region and towards less subsistence dependent urban residents. Testimony from some local residents of Unit 13 indicated they no longer participated in the state subsistence program. The present Tier II scoring and permit allocation system has made it more difficult for long-time, resource-dependent residents of the area to compete for permits, forcing them to rely more heavily on the federal system to provide for subsistence opportunities. The system also makes it almost impossible for area newcomers and younger Alaskans to ever qualify for the limited permits despite their subsistence dependence on wildlife resources for food. In addition, many of the traditions associated with a subsistence way of life are being sidestepped and avoided, such as the traditional teaching of the art of hunting, fishing and trapping to younger generations; and the processing, utilization, and other long-term social and cultural relationships to the resources being harvested and to the land that produces those resources.

The Board's long-term goal is to design a system to accommodate subsistence-dependent users in such a manner that permits can be virtually guaranteed from year to year. The reliability of available hunting opportunities is critical to the maintenance of the subsistence way of life. This could be similar and complementary to the federal subsistence permit system. The federal program allows any Alaska resident living in the Copper Basin and several communities outside

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of GMU 13 to harvest two caribou and one moose per year, there is no limit per household except in Unit 13(E) for moose, harvest of caribou by gender is also generally unrestricted in units 13(A) and 13(B), and moose hunters may only take any antlered bull under the federal system.

Bag limits may not be accumulated across both state and federal systems, so hunters can take a total of only one moose and two caribou for the year. State regulations allow all Alaskan residents to harvest a bull moose with spike-fork or 50-inch antlers or antlers with 4 brow tines on at least one side from September 1 – 20. In addition, up to 150 Tier II permits are issued for any bull moose, August 15 – 31, with only one permit being allowed per household. The moose seasons for federally qualified users on federally-managed lands are much longer from August 1 – September 20.

Under the state system, all caribou permits are issued under Tier II regulations and were limited to 3 per household. The Board recently changed the limit to 2 per household. The bag limit is one caribou, although in recent years, harvest under state regulation has been limited to bulls only. The caribou season for federally qualified users on federal land is 10 days longer in the fall, ending September 30 rather than September 20.

State regulations do not jeopardize a qualified federal subsistence hunter from hunting under a federal permit. However, if there are too many state applicants, controlling statutes mandate that permits be issued under the Tier II criteria, with all of its attendant problems.

The Board intends to explore subsistence hunt provisions that reflect and accommodate the customary and traditional use patterns of Nelchina caribou and moose in Game Management Unit (GMU) 13, while distinguishing those uses from other uses.

In accordance with the Joint Boards of Fisheries and Game eight criteria for implementing the state subsistence law, the following findings are made:

Findings

When the Board originally determined there were customary and traditional uses of the Nelchina Caribou Herd and moose in GMU 13, it recognized these subsistence uses were established by Ahtna Athabascan communities within the Copper River basin, and were later adopted by other Alaska residents. Due to the importance of, and high level of competition for subsistence permits in this area, the Board has undertaken, as precisely as possible, the task to identify the particular characteristics of these customary and traditional use patterns. Although they have changed over time due to limited access associated with demographic, economic, and technological factors, the patterns are characterized by traditional fall and winter hunting seasons, efficient methods and means, thorough use of most of the harvested animal, harvest areas traditionally associated with local communities, traditions about harvesting and uses that are passed between generations orally and through practice, and reliance on other subsistence resources from within these same traditional harvest areas

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Criterion 1. A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.

This criterion presupposes that an identifiable, consistent “pattern” of noncommercial taking, use, and reliance is characteristic of subsistence use. The Board finds, even though there are many similarities among all users of the moose and caribou resources in the area, there continue to be identifiable distinctions, constituting a unique pattern of subsistence use, that is traceable in direct line back to the original Ahtna Athabascan and later non-native customary and traditional use.

The Board has concluded that the pattern of moose and caribou subsistence use for this region was originally defined by the Ahtna Athabascan residents and then adopted and modified by other local settlers in the early 20th century. This pattern of use was established over many generations and focused on the total aggregate of fish, wildlife, and plant resources locally available to the area residents.

The greatest dependency on subsistence resources occurred prior to the completion of the existing road system in the 1940s. After about 1950, historical use patterns changed rapidly, especially with the introduction of more mechanized access methods. The mobility of the subsistence and non-subsistence users, the availability of seasonal and part-time employment, increased human populations, increasing competition for wildlife resources, and fluctuating game populations (particularly moose and caribou) caused major shifts in subsistence dependency of people within and adjacent to the region. Nevertheless, aspects of the traditional Ahtna Athabascan use pattern are present today, but subsistence-dependent families engaged in that pattern now account for a smaller percentage of all users than a half-century ago.

Most of the long-term subsistence patterns in this area are community-based. The area's communities tend to be long-established, by Alaskan standards, and the residents of these communities tend to be long-term residents, descending from multi-generational families with long ties to the area. These communities tend to exhibit a use of local resources that stretches back to well before Euroamerican contact. In contrast, the use pattern based out of nearby urban areas tends to involve much more recently established communities, a high degree of turnover among residents, short-term residency and, generally, a relatively brief history of use.

Criterion 2. A pattern of taking or use recurring in specific seasons of each year.

Local communities established a tradition of hunting caribou, moose, and other big game species in the late summer and early fall following subsistence fishing, and again hunting in the winter as fresh meat was needed and game was available. Winter hunts have always been critical to subsistence users, as very few other subsistence resources are available during this time. This need for, and use of, winter hunting opportunities is different from use patterns developed by residents of Alaska's more developed and urban areas, where almost all big game hunting takes place exclusively in the fall and is controlled largely by regulations. Thus, as late as 1984, over 60% of the caribou harvest taken by local residents was taken during the winter. Recent changes in that pattern can be largely attributed to regulatory changes, competition from non-local

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hunters and shifting migratory patterns of the caribou herd. The seasonal use pattern was based on the traditional Ahtna seasonal movements and the general availability of game. For example, the fall hunt traditionally followed the salmon harvest, whereas the winter hunt took place whenever meat was needed and game was available.

Criterion 3. A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.

Before the mid-20th century, Ahtna Athabascan hunters tended to rely on boat access along the area's major waterways in fall, on foot along established trails, and by dog team along winter trails after freeze-up. With the opening up of the Nelchina basin to highway access, and the introduction of off-road vehicles, snowmachines, four-wheelers, and other transportation innovations, a shift in the use pattern occurred. Now, local residents tend to utilize roads as hunting corridors in place of rivers in the fall, and use snowmachines to access the backcountry in winter. Recently, expensive off-road vehicles have been purchased and used by many non-local users and a few more affluent local residents in an attempt to compete with non-local hunters and to increase their opportunity for success. The use of all terrain vehicles may create their own hunting efficiencies as hunting effort and transportation take advantage of labor-saving devices. Hunting methods have changed over the last 75 years. Automobiles, snowmachines, and less expensive all terrain vehicles may make hunting more effective because local and non-local residents can now cover larger areas when hunting caribou or moose. Local hunters can, when animals are available, make relatively short trips that fit into a contemporary work schedule. On the other hand, the use of highway, off-road, and similar vehicles has promoted more frequent short trips with considerable transportation costs for depreciation, fuel, and maintenance. What are being lost are the multi-resource harvest efficiencies associated with long subsistence-oriented summer and fall camping trips traditionally engaged in by Ahtna communities. Thus, recent transportation improvements and fuel prices may have changed traditional subsistence activities to the point where it is unlikely that there is a positive cost/benefit (from an economic standpoint) associated with some of the hunting techniques, especially in cases involving the use of expensive recreational motor vehicles. Overall, the use of some motorized vehicles such as ATVs has blurred the distinction between true customary and traditional patterns and recreational activities.

Residents of local communities—those with the longest histories of use of moose and caribou in the region—have traditionally traveled shorter distances to hunt than do non-local participants; and generally utilize less technology in doing so. Most Ahtna elders testified they still prefer to walk in to hunting areas and maintain permanent camps, whenever possible, in accordance with longstanding means and methods. On the other hand, most non-local users must travel at least 125 miles just to get to the area and have tended to be reliant on all-terrain vehicles (ATVs), aircraft and other expensive off-road and recreational vehicles.

As late as 1984, Copper Basin residents utilized only highway vehicles for hunting access over 65% of the time. It is the Board's conclusion that many of these newer technologies have been adopted based on a perceived need to compete with technologically-oriented recreational hunters from Alaska's urban areas. This may be a direct effect of the 1984 regulations.

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Historically, much of the taking of caribou, moose, and small game was done as part of a seasonal round of subsistence activities throughout defined areas used by the community. Family dependence on these resources required a commitment of considerable time and effort to accumulate adequate subsistence resources to meet annual protein requirements and other customary and traditional uses.

Another example of subsistence efficiency in the customary and traditional use pattern has been that specialized hunters tend to provide for the community at large, sometimes or often taking more than necessary for their own family's use in their capacities as community providers, and to fulfill social and cultural obligations. Community subsistence activities are then divided among members and further introduced into traditional patterns of barter and exchange. Thus, some harvest and others process, distribute, receive and utilize the results of the harvest. Each member of the community has a defined role and specialty.

A third example of subsistence efficiency, historically, has been the effort to keep hunting as close to home as reasonably possible, minimizing cost and effort necessary to obtain the wild food resources needed by families and communities. The Board believes that, if competition among users can be reduced, this efficiency is likely to be easier for subsistence users to realize.

In these community efforts, special emphasis has been placed on allowing the maximum opportunity to harvest as many animals and the widest variety of useable species as efficiently as possible. Emphasis was also placed on food gathering activities and other traditions associated with Ahtna Athabascan communities.

Criterion 4. The area in which the noncommercial long-term, and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.

The Board is examining the area where the subsistence hunting of big and small game occurred prior to the significant change in uses and activities that occurred after approximately 1950 in Game Management Unit 13.

Subsistence uses involve an intimate and exclusive relationship between the user and a very particular set of places generally in close proximity to the hunter's residence. The user is tied to the land. Other types of uses do not exhibit these close, long-term, multi-generational ties to a particular locality. Even as late as 1981, hunters from Copper Basin communities did not report traveling out of the basin to hunt, while urban-based hunters named alternative areas if they could not hunt Nelchina caribou and moose. Testimony from Ahtna elders emphasized their reliance on local fish and game, and their reluctance, for practical and cultural reasons, to travel outside of their traditional areas for subsistence purposes. Likewise, they described the longstanding family and community use histories and patterns for such areas. Consistently, lifelong residents of the local areas did not share the attitude of utilizing other areas. When Nelchina caribou were not available to them they either added emphasis on moose, and/or use of the Mentasta caribou herd. Resident lake fish species and small game were other alternatives commonly mentioned as alternative and supplemental wild food resources. Families in the range of the Nelchina caribou who harvested little or no wild game mentioned receiving donated meat as an alternative. This differs markedly from the use patterns found in Alaska's urban areas,

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where traveling to, and exploring, new game country is deemed a virtue and an essential part of many outdoor experiences.

The Ahtna pattern exhibits a familiarity with terrain and landscape including the associated history of the region transmitted through oral traditions and Ahtna geographic placenames.

Criterion 5. A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.

The traditional pattern has been to salvage and use all parts of the harvested animal, in conformance with traditions prohibiting waste. Lifelong residents of the Copper Basin testified they still practice their traditional methods of harvest by retrieving the entire carcass and all bones, hide, head, heart, liver, kidneys, stomach, and fat. Only the antlers were often left behind. This also differs from patterns based out of urban areas, where hunters tend to focus on the meat and antlers, usually leaving most organs, bones, and the hide in the field.

Ahtna elders also emphasized that preparation and storage are viewed as essential components of their overall use. Women traditionally look forward to practicing their roles as preparers and preservers of harvested game every bit as much as men looking forward to harvesting and providing the game. These traditions and roles are passed on by older relatives to younger family members through in-the-field training and a system of *engii* (rules of appropriate behavior or taboos) that teach traditional means of harvest, handling, and preparation. These “engii” emphasize traditional Ahtna views of the human place within the natural world and a respectful treatment of animals.

Criterion 6. A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.

The Board has concluded that the subsistence traditions of handing down the hunting and fishing knowledge, values and skills through family oriented experiences are an important aspect of the subsistence way of life in this region. Providing the opportunities for the young and old to participate in subsistence activities is critical to the perpetuation of traditional knowledge about hunting locations, hunting methods, methods of handling harvests, and respectful treatment of wildlife. To increase hunting opportunities for youth, a recent provision adopted by the Board allows a resident hunter between the ages of 10 and 17 to hunt on behalf of a resident permit holder. The youth hunter must have completed a certified Basic Hunter Education course and be in direct supervision of the permit holder, who is responsible for ensuring all legal requirements are met.

Ahtna elders have passed this knowledge on to the next generation in the context of community-based traditions that included relatively long summer and fall camping trips described above. As mentioned previously, teaching roles and lessons tend to be more formalized through the system of “engii” than is the case for uses based out of the urban areas. Skills emphasized included not only those needed to harvest each species, but also the art of field preparation and care for a wide

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variety of species and the utilization, preparation, and distribution of game. Most local users learned how to hunt in the local area from other family members in the local area. Most older, local users have also taught other family members. On the other hand, most non-local users learn about hunting in the area by personal experience or from fellow non-local, unrelated hunters. Also, non-local users tend to be controlled primarily by applicable statutes and regulations rather than long-term oral traditions and community-based values.

The Board considers it extremely important to stress the need to pass on skills and knowledge associated with utilization of all parts of the animal taken, as well as preservation of the traditional, cultural rules and family values associated with these subsistence users in this area. Field skills need to be perpetuated for handling not only the meat but the hides, internal organs, stomach, and intestines. This is consistent with the customary practice of maximizing the use of animals taken characteristic of subsistence uses.

Criterion 7. A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.

Widespread community-wide sharing is customary in local communities, involving all family members, elders, others in need, and taking place in formal settings such as during ceremonial potlaches. As such, sharing has associated social, cultural, and economic roles in the community. Sharing is expected and follows well-understood community standards that are structured on kinship relations and obligations. As an example, young hunters are required by Athabaskan tradition to give all or most of their first harvested animal to elders and others in need. Also, traditional barter and exchange follow these standards. Successful Ahtna harvesters traditionally share some of their moose and caribou meat with other families and communities to meet their social obligations and for ceremonial purposes. This, again, is in contrast to the uses arising out of the urban areas where hunters are completely free to share, or not share, as they see fit and there is not a system of sharing, barter, and exchange. In addition to the key social and cultural roles of sharing in the local rural community, sharing of subsistence resources plays a key economic role in distributing essential food supplies throughout the community. The Board has concluded it is imperative to accommodate the customary and traditional family and community harvest sharing practices as part of the subsistence way of life to the maximum extent possible.

Use of the state authorized proxy system has provided a limited opportunity for individuals to harvest for permittees who are personally incapable of participating in the field but who have a personal history of subsistence use. Proxy hunters are not required to fully accommodate the customary and traditional practices. Non-local users, on the other hand, tend to have few established rules or traditions requiring sharing, and seldom share outside of their own households. External sharing, when it occurs, is usually with friends and co-workers, and extensive kinship networks are absent. There are no non-local traditions of community-wide meat distribution.

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Criterion 8. A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

The Board has concluded it is critical to emphasize the values associated with the reliance and dependence on a wide variety of fish and wildlife resources as an important element of the subsistence way of life for this region. Subsistence use patterns historically required a significant dedication of time and effort towards the harvesting of adequate fish and game resources to meet the protein and nutritional requirements of the subsistence harvesters, their families, and their communities.

This differs markedly from the more recreational type of uses arising out of the Alaska's more urban areas, where a single, focused effort to harvest only one resource in any given location, and then salvage only what is legally required from that resource, tends to be a predominant characteristic. To the extent that other foodstuffs are harvested, they are often harvested in completely separate areas, far removed from the fall hunting area. Also, different hunting areas are explored in different years. This separation of the interconnected diversity of resource uses also seriously undermines the principles reflected in Criterion 3. As more and more emphasis is placed on single species harvesting patterns, cost is increased, and efficiency is reduced. Such practices do not reflect the customary and traditional use pattern.

Reliance on most, or all, locally available sources of wild food is characteristic of a traditional subsistence way of life where maximum economic and nutritional benefits typically must be derived from the hunt and harvests. The local harvest of salmon has historically been the most important wildlife resource in terms of useable pounds per subsistence-dependent family in Unit 13. Alaska residents are allowed to use a fish wheel in the Copper River between Slana and the Copper River bridge at Chitina to harvest salmon—permits are issued free of charge. The limit is 500 total salmon for a household with two or more members and 200 for a household with one member, with no limit on the number of Chinook salmon in the total harvest by fish wheel. The salmon run in the Copper River is primarily comprised of sockeye and Chinook salmon.

Use of moose and caribou by local communities is embedded in a wide range of other fish and wildlife uses. It is also embedded in a mixed, subsistence-cash economy characterized by seasonal employment and relatively low cash incomes. A wide variety of subsistence foods are still critically important in these local economies. Almost all hunting, fishing, and gathering takes place locally and the majority of meat and fish consumed tends to come from local sources.

Big game species are taken for food and not for their trophy value by families engaged in subsistence uses. The Board may undertake efforts to reduce or eliminate the trophy values of the resources taken to focus entirely on the inherent subsistence values.

Vote: 6/0
November 12, 2006
Anchorage, Alaska

Ron Somerville, Chairman
Alaska Board of Game

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ALASKA DEPARTMENT OF FISH AND GAME
Copper Basin MOOSE
Community Subsistence Harvest Permit
PROGRAM 2012-2013



HUNT ADMINISTRATION

Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game's statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.

COPPER BASIN MOOSE CSH PERMIT

According to regulations found at 5 AAC 92.072 *Community Subsistence Harvest Hunt Area* and at 5 AAC 92.052 *Discretionary Permit Hunt Conditions and Procedures*, ADF&G may issue community-based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area. The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) *Community Subsistence Harvest Areas*), hereafter referred to as the Copper Basin CSH area.

The CSH permit program allows communities or groups of 25 or more to apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin moose CSH permit, a Copper Basin caribou CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.

The hunt conditions in this Copper Basin Moose CSH permit program are made for the purposes of notifying the community/group of users of how to use the moose in a manner consistent with the customary and traditional use pattern described in the board's 2006 and 2011 findings *Game Management Unit 13 Caribou and Moose Subsistence Uses (2006-170-BOG and 2011-184-BOG)*, as well as to ensure an orderly administration of the CSH permit program and hunt (CM300).

A community or group may possess only one (1) Copper Basin Moose CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Moose CSH group per regulatory year. The Copper Basin Moose CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Moose CSH permit is the responsibility of the community or group coordinator.

APPLICATION PROCESS
THE COMMUNITY OR GROUP COORDINATOR

In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Moose CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Moose CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Moose CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Moose Harvest Permit to each coordinator.

November 8, 2011

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For 2012–2013, the group application period will be November 1 – December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:

- 1) at least 25 eligible group members have applied (including the group coordinator), and
- 2) all moose CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first-time CSH groups).

Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050 *Required Permit Hunt Conditions and Procedures*. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see "For More Information," below).

There is no limit to the number of communities or groups that may apply for a Copper Basin Moose CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.

INDIVIDUALS/HOUSEHOLDS

Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.

A "household" means that group of people domiciled in the same residence per 5 AAC 92.990 (23) *Definitions*.

By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (*Game Management Unit 13 Caribou and Moose Subsistence Uses*).

ADF&G will issue one (1) Copper Basin CSH moose harvest ticket/report to each household member listed on the application (the bag limit is 1 bull / person; see "Open Seasons, Bag Limits, and Antler Restrictions," below).

Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter's license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter's possession until the animal has been delivered to the location of processing for human consumption.

Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the final season, even if the hunter did not hunt or did not take an animal. Hunters may also report online.

PARTICIPANT ELIGIBILITY

All household members subscribing to the Copper Basin Moose CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).

no collective limit to the number of moose meeting general season antler restrictions (see below) that can be taken under the Copper Basin Moose CSH permit.

The bag limit is one (1) bull moose per person in Unit 11 and 13 and one (1) bull moose with spike/fork, or 50" antlers, or 4 or more brow tines in the open portion of Unit 12, unless modified by ADF&G emergency order.

If the number of "any-bulls" reported taken for any one geographic area reaches or exceeds established conservation limits (announced prior to hunting season), the area will remain open to CSH hunters, although the bag limit will change by emergency order to reflect the general season antler restriction for the area.

The Copper Basin Moose CSH hunt season dates and general season antler restrictions are listed below:

Area	CSH Season Dates	General Season Antler Restrictions
Unit 11	August 10–September 20	Spike/fork, or 50" antlers, or 3 or more brow tines.
Unit 13	August 10–September 20	Spike/fork, or 50" antlers, or 4 or more brow tines.
Portion of Unit 12	August 24–August 28 and September 8–September 17	Spike/fork, or 50" antlers, or 4 or more brow tines.

DESIGNATED HUNTERS

The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest wildlife resources on behalf of the members of the community or group. To take a moose on behalf of another CSH harvest ticket holder (beneficiary), a hunter must carry both the beneficiary's and their own CSH moose harvest ticket in the field while hunting. The harvested moose must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.

HUNT TERMS AND CONDITIONS

Customary and traditional uses of Unit 13 moose are thoroughly described in 2006-170-BOG and 2011-184-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Moose CSH hunt must salvage for human consumption:

1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the head, heart, liver, kidneys, stomach, and hide; and
2. Meat of the head, frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring moose harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group / community coordinator.

CUSTOMARY AND TRADITIONAL USE PATTERN

The edible products of moose taken under the terms of a Copper Basin Moose CSH hunt must be used for human consumption and may not be sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already

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established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the Unit 13 board findings summarized below:

1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area.
2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible.
3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area.
4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area.
5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Moose CSH permit.
6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge associated with use of all parts of the harvested animal.
7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, including customary trade, barter, and gift-giving.

In order to observe this pattern, a portion of the edible products of moose taken under the terms of a Copper Basin Moose CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. In addition, hunters who have harvested their first moose should give a portion to other members of the community or group.
8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Nelchina caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.

REPORTING

Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. Hunters may also report online.

Failure to report may jeopardize sustained yield management of Copper Basin moose and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.

To better address the subsistence needs of Copper Basin Moose CSH participants, the board requested that all moose harvested by CSH participants within the CSH area be accounted for, regardless of whether

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taken under federal or state regulations. All moose taken (that do not meet general antler restrictions) by Copper Basin Moose CSH participants within the CSH area will count against the up to 70 any-bull moose allowed for the CSH hunt.

In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Moose CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group's member households' required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by October 20. Additional supplemental reports can be submitted after October 20, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Moose CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Moose CSH hunts. Group coordinators are encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.

The written report must include, at a minimum:

1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Moose CSH permit; and
2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Moose CSH permit; and
3. The number of moose taken in federal subsistence hunts by those hunters also participating in the Copper Basin Moose CSH hunt; and
4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event.

Some information in these reports may be subject to state confidentiality laws.

Deliver or mail reports to: ADF&G Copper Basin CSH
P.O. Box 47
Glennallen, AK 99588

FOR MORE INFORMATION

Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461.

Send completed applications to your local ADF&G office, or:
ADF&G Copper Basin Community Subsistence Hunt
333 Raspberry Road
Anchorage, AK 99518

The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526 ; U.S. Fish and Wildlife Service, 4401 N Fairfax Drive, MS 2042, Arlington, VA 22203; Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers: (VOICE) 907-465-6077; (Statewide Telecommunication Device for the Deaf) 1-800-478-3648; (Juneau TDD) 907-465-3646; (FAX) 907-465-6078; For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465-4176.

N0033

Additional Household Members Age 10 and Older

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



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FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

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ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



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ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

When you have completed this form return it to:

_____ Group Coordinator

Revised 20116308

N0033

ATTACHMENT D

Page 1 of 6



ALASKA DEPARTMENT OF FISH AND GAME
Copper Basin CARIBOU
Community Subsistence Harvest Permit
PROGRAM 2012-2013



HUNT ADMINISTRATION

Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game's statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.

COPPER BASIN CARIBOU CSH PERMIT

According to regulations found at 5 AAC 92.072 *Community Subsistence Harvest Hunt Area* and at 5 AAC 92.052 *Discretionary Permit Hunt Conditions and Procedures*, ADF&G may issue community-based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area. The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) *Community Subsistence Harvest Areas*), hereafter referred to as the Copper Basin CSH area.

The CSH permit program allows communities or groups of 25 or more to apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin caribou CSH permit, a Copper Basin moose CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.

The hunt conditions in this Copper Basin Caribou CSH permit program are made for the purposes of notifying the community/group of users of how to use caribou in a manner consistent with the customary and traditional use pattern described in the board's 2006 and 2011 findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG and 2011-184-BOG), as well as to ensure an orderly administration of the CSH permit program and hunt (CC001).

A community or group may possess only one (1) Copper Basin Caribou CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Caribou CSH group per regulatory year. The Copper Basin Caribou CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Caribou CSH permit is the responsibility of the community or group coordinator.

APPLICATION PROCESS

THE COMMUNITY OR GROUP COORDINATOR

In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Caribou CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Caribou CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Caribou CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Caribou Harvest Permit to each coordinator.

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2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

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For 2012–2013, the group application period will be November 1 – December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:

- 1) at least 25 eligible group members have applied (including the group coordinator), and
- 2) all caribou CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first time CSH groups).

Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050 *Required Permit Hunt Conditions and Procedures*. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see “For More Information,” below).

There is no limit to the number of communities or groups that may apply for a Copper Basin Caribou CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.

INDIVIDUALS/HOUSEHOLDS

Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.

A “household” means that group of people domiciled in the same residence per 5 AAC 92.990 (23) *Definitions*.

By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (*Game Management Unit 13 Caribou and Moose Subsistence Uses*).

ADF&G will issue one (1) Copper Basin CSH caribou harvest ticket/report to each household (the bag limit is 1 caribou / household).

Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter's license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter's possession until the animal has been delivered to the location of processing for human consumption.

Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the final season, even if the hunter did not hunt or did not take an animal. This hunt may close early; it is the hunter's responsibility to check for Emergency Closures. Hunters may also report online.

PARTICIPANT ELIGIBILITY

All household members subscribing to the Copper Basin Caribou CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).

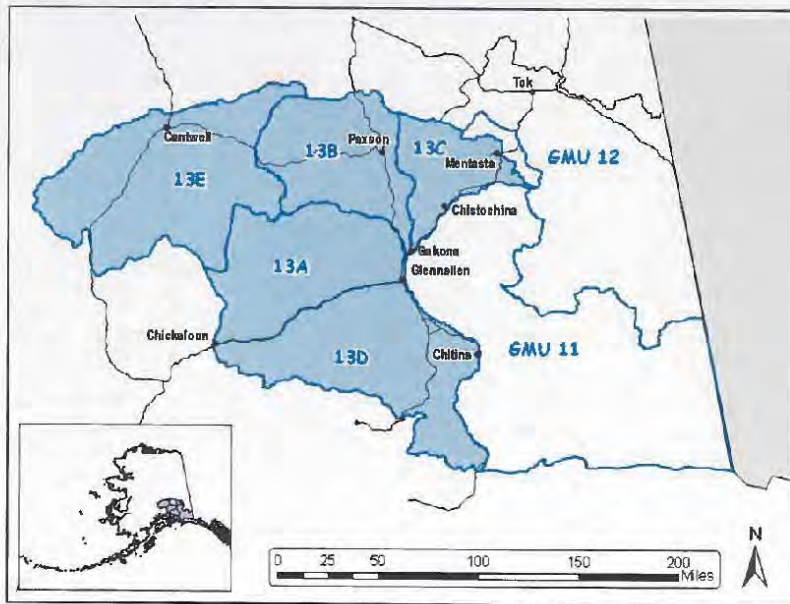
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- No member of the household can apply for any drawing/Tier I/Tier II/registration caribou hunts, or hold general season caribou harvest tickets (unless the hunt occurs after the close of the CSH hunt and the bag limit is higher).
- No member of the household can apply for drawing/Tier I/Tier II/registration moose hunts outside the Copper Basin CSH hunt area.
- All household members agree to hunt moose and caribou only within the Copper Basin CSH hunt area.
- No member of the household can be on the Failure to Report (FTR) list.

COPPER BASIN CSH PERMIT HUNT AREA, AND AREA OPEN TO CARIBOU HUNTING

The Copper Basin CSH permit hunt area includes all of Unit 11, Unit 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off) per 5 AAC 92.074 (d). Due to conservation concerns for adjacent caribou herds, only Unit 13 is open to caribou hunting under the terms of a Copper Basin Caribou CSH permit.



OPEN SEASONS AND BAG LIMITS

The Copper Basin Caribou CSH season is: August 10 – September 20, and October 21 – March 31. The bag limit is one (1) caribou per household. For conservation reasons, the season and bag limit may be

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2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

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modified by ADF&G emergency order. Up to 300 caribou can be taken under the Copper Basin Caribou CSH permit program (applies to all groups collectively).

DESIGNATED HUNTERS

The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest wildlife resources on behalf of the members of the community or group. To take a caribou on behalf of another household (beneficiary), a hunter must carry both the beneficiary's and their own CSH caribou harvest ticket in the field while hunting. The harvested caribou must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.

HUNT TERMS AND CONDITIONS

Customary and traditional uses of Nelchina caribou are thoroughly described in 2006-170-BOG and 2011-184-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Caribou CSH hunt must salvage for human consumption:

1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the heart, liver, kidneys, and fat; and
2. Prior to October 1, meat of the frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring caribou harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group / community coordinator.

CUSTOMARY AND TRADITIONAL USE PATTERN

The edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt must be used for human consumption and may not be sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the Unit 13 board findings summarized below:

1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area.
2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible.
3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area.

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4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area.
5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Caribou CSH permit.
6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge associated with use of all parts of the harvested animal.
7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, including customary trade, barter, and gift-giving.

In order to observe this pattern, a portion of the edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. In addition, hunters who have harvested their first caribou should give a portion to other members of the community or group.

8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Nelchina caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.

REPORTING

Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. If the season is closed early by emergency order, unsuccessful (and did not hunt) reports must be returned within 15 days of the closure. Hunters may also report online.

Failure to report may jeopardize sustained yield management of the Nelchina caribou herd and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.

To better address the subsistence needs of Copper Basin Caribou CSH participants, the board requested that all caribou harvested by CSH participants within the CSH area be accounted for, regardless of whether taken under federal or state regulations. All caribou taken by Copper Basin Caribou CSH participants within the CSH area will count against the up to 300 caribou allowed for the CSH hunt.

In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Caribou CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group's member households' required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by April 30. Additional supplemental reports can be submitted after April 30, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Caribou CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Caribou CSH hunts. Group coordinators are

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2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

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encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.

The written report must include, at a minimum:

1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Caribou CSH permit; and
2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Caribou CSH permit; and
3. The number of caribou taken in federal subsistence hunts by those hunters also participating in the Copper Basin Caribou CSH hunt; and
4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event.

Some information in these reports may be subject to state confidentiality laws.

Deliver or mail reports to: ADF&G Copper Basin CSH
 P.O. Box 47
 Glennallen, AK 99588

FOR MORE INFORMATION

Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461.

Send completed applications to your local ADF&G office, or:

ADF&G Copper Basin Community Subsistence Hunt
 333 Raspberry Road
 Anchorage, AK 99518

The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526 ; U.S. Fish and Wildlife Service, 4401 N. Fairfax Drive, MS 2042, Arlington, VA 22203; Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers: (VOICE) 907-465-6077; (Statewide Telecommunication Device for the Deaf) 1-800-478-3648. (Juneau TDD) 907-465-3646; (FAX) 907-465-6078; For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465-4176

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N0033



2012 - 2013 Copper Basin Community Harvest Group Application

USE BLACK BALLPOINT PEN ONLY. You MUST PRINT NEATLY within the boxes and use ALL CAPITALS.
Due to the use of scanning technology, failure to do so could lead to your application being rejected.

Group Name

--

Group Mailing Address

--

CITY	STATE	ZIP CODE

Group Coordinator

FIRST NAME	MI	LAST NAME	SUFFIX: (JR., SR., ETC.)	MM	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

HOME PHONE NUMBER
() () () - () () ()

CELL PHONE NUMBER
() () () - () () ()

All contact information provided is
subject to public disclosure.
DO NOT SUBMIT
Unlisted Phone Numbers.

EMAIL ADDRESS

GROUP COORDINATOR'S SIGNATURE

DATE

Secondary Group Contact

FIRST NAME	MI	LAST NAME	SUFFIX: (JR., SR., ETC.)	MM	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

HOME PHONE NUMBER
() () () - () () ()

CELL PHONE NUMBER
() () () - () () ()

All contact information provided is
subject to public disclosure.
DO NOT SUBMIT
Unlisted Phone Numbers.

Group Number
2012- () () - () ()
Community Harvest Program Type
<input type="checkbox"/> Moose OR <input type="checkbox"/> Caribou

To ADF&G Staff:

- 1) Have Group Coordinator complete the form above
- 2) Group Name, Mailing Address, and Group Coordinator sections must be completed and signed before proceeding
- 3) Group Coordinator must specify whether this application is for the Moose or Caribou program. If necessary they can fill out an additional application and apply for both programs.
- 4) A Group Number can be retrieved from:
WinfoNet > Traditional Use Permits > Copper Basin Community Harvest
- 5) Photocopy this form and provide copy to Group Coordinator

REVISION 20110315

N0033

Additional Household Members Age 10 and Older

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

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SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

**When you have completed
this form return it to:**

_____ Grand Coordinator

Revised 20110308

N0034

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0034	paul roderick	president	talkeetna air taxi	General (to the EIS), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>This comment is submitted by Talkeetna Air Taxi (TAT) a FAR part 135 air taxi headquartered in Talkeetna, Alaska. TAT owns and operates 8 aircraft and is one of the largest air services in the area. The comments will concentrate on the proposed expansion of the Fox 3 MOA. Most of the clients we fly into the mountains and rivers in the Talkeetna area including the Talkeetna Mountains expect a natural pristine environment that is relatively free of pollution and noise. The user groups that frequent the Talkeetna Mountains are as follows: rafters on the Talkeetna River, climbers and skiers on the glaciers and high peaks in the Mount Sovereign area, hikers in the lower tundra mountains, hunters, and photographers. These user groups are very concerned with the expansion of the Fox MOA and feel this will potentially ruin their experience in the mountains. The central theme stems from both the low level flight potential (500ft) and the expansion of it. One of the great draws of the Talkeetna Mountains is that is is far from any large groups, a quiet environment, and relatively close to Talkeetna. It offers a Brooks Range type experience that is a fraction of the cost. We as an air service feel a need to protect this type of environment for there are few left. Once word gets out that it is in a hot MOA that is approved for low level ops with military aircraft its reputation could be ruined in short order. The next concern is potential conflict with our aircraft and the low level operations. We operate with military aircraft in the Susitna MOA and the Denali area. We have had conflict with fighters straying from the MOA and entering Denali Park. The concerning aspect is the aircraft are not tuned to the common frequency. We have complained over the years but there has not been any acknowledgement. We feel operations in the expanded FOX MOA will increase the risk of a potential mid-air and our pilots are very concerned. Hunters in town of Talkeetna have voiced concern about the low level operations by military aircraft. They feel this could disrupt caribou migration, breeding and even the hunt. Climbers and skiers are concerned about potentially being avalanched by the effects of low flying aircraft and sonic booms. As a pilot looking at an aviation map I am amazed there needs to be expansion to the MOAs.</p> <p>Galena, Stony, Susitna, Fox, Delta.....all consume hundreds of square miles! The proposed Susitna Dam has increased air traffic and should be addressed in your study. In closing we feel very strongly that the no action alternative should be chosen. Thanks.</p>

N0035

[REDACTED]

From: Ruth McHenry [REDACTED]
Sent: Monday, July 09, 2012 11:54 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

July 9, 2012

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

JBER, AK 99506

Re: JPARC Modernization and Enhancement DEIS

Gentlemen:

Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. All share an appreciation for the region as it is: scenic and wild, with the chance to see interesting wildlife. Most of our members also engage in subsistence activities in the region. Following are our comments on the JPARC Modernization and Enhancement Draft Environmental Impact Statement (DEIS). Our comments are confined to the FOX and Paxson Military Operations Areas (MOAs).

We are completely opposed to Alternatives A and E in the JPARC Draft Environmental Impact Statement. We prefer the No Action Alternative, but only because no alternate was presented that would have addressed the current flagrant violations of horizontal and vertical airspace and of supersonic speeds below FAA limits.

DEIS FAILS TO ADDRESS SIGNIFICANT ISSUES THAT WERE RAISED IN SCOPING:

Failure to Discuss Violations by Air Force Jets

N0035

Airspace violations are not rare: Our members and others have observed Air Force jets flying below the required 5000 feet AGL in the Fox 3 MOA, training below 18,000 feet in the Paxon ATCAA, and flying at supersonic speeds when they are below required minimums. Our organization raised this issue in our scoping comments. The Bureau of Land Management documented specific incidents. (See v. II, A-45 and A-46.) I believe that other commenters also raised this issue. We have been unable to find any reference to this issue in the DEIS, other than including the BLM documents and mentioning the toll-free number that citizens can use to report jet noise. Noise is clearly not the only issue here, and the DEIS does not—as far as we can determine—disclose that there are violations.

Our organization’s scoping comments specifically requested that this issue be addressed, and we suggested mitigations: “All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1.”

Failure to Address Important Cumulative Impacts

Susitna Dam:

The proposed Susitna-Watana dam is a huge project for which the Federal Energy Regulatory Commission (FERC) is preparing an Environmental Impact Statement. It has strong backing from the state legislature, which in the summer of 2011 provided the Alaska Energy Authority with \$66 million to study it; therefore, it is “reasonably foreseeable.” The dam’s impacts to wildlife could be substantial, as evidenced by ADFG embarking on multi-year studies on the Nelchina caribou herd, moose, and ptarmigan, while other entities are conducting studies of potential impacts to migratory birds. The dam site would lie beneath the Fox 3 MOA, where this DEIS proposes to lower the minimum flight level from 5,000 feet above ground level (AGL) to 500 feet AGL. According to scoping comments provided by ADFG and USFW on the JPARC proposal, these low-level flights are of particular concern with regard to many wildlife species, including the moose, the Nelchina caribou herd, and migratory birds being studied for the Susitna-Watana project. Also, one of the proposed access roads, departing from the Denali Highway, underlies the Fox 3 MOA. Certainly this is a cumulative impact that should have been mentioned.

Mineral Exploration and Mining:

The DEIS (vol. I, page 3-59) addresses mining claims and active mines in the region. It depicts them in Figure 3-12. Curiously, it does not list any of them as having cumulative impacts in conjunction with the JPARC proposals. To take one example with which our organization is very familiar, Pure Nickel, Inc., has been conducting exploratory drilling on its “MAN” nickel/copper/platinum claims, which include important wintering and rutting grounds for the Nelchina caribou herd. This is of concern to resource managers. As the

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Alaska Board of Game wrote in its March 26, 2008 letter to the Governor, "We recognize the potential for mineral extraction in this area and in associated mineral leases, but remain convinced the long-term value of maintaining wildlife habitat far outweighs the potential benefits of possible development projects known at this time." The claims area is also an important subsistence area and is a favorite destination for hikers, paddlers, photographers, mushers, and tour companies. To date, multinational ITOCHU has invested \$17 million on these claims, making it sufficiently foreseeable to deserve mention. As another example, the DEIS mentions active mining north of the Denali Highway at Valdez Creek, but does not discuss whether there might be cumulative impacts with regard to subsistence, recreation, or wildlife.

In spite of the all the above, the DEIS says, with regard to cumulative impacts to biological resources: "**Cumulative Impacts of JPARC Proposals with Other Non-Military Actions.** No substantive non-military actions have been identified for the areas under the proposed expanded Fox 3 or Paxon MOAs; therefore, contributions of non-military actions to cumulative effects in the Fox 3/Paxon MOA proposal area would be insignificant." (DEIS v. I, page 4-27)

Climate Change:

Our scoping comments stated, "Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika." The only reference that the DEIS makes to climate change is on page 4-17, where air quality is discussed. There is no mention of how implementation of Alternative A or E might interact with climate change to affect biological resources. For instance, how might low level flights and/or sonic booms affect denning wolverine?

DEIS UNDERSTATES IMPACTS:

Noise:

The DEIS gives 123 dB as the loudest noise that would be heard in the Fox 3 and Paxson MOAs during low-level (500 feet AGL). Presumably, this would be generated by subsonic flight, because supersonic flight is not supposed to be conducted below 5,000 feet AGL or 12,000 feet AGL. "This degree of noise would likely annoy or startle persons overflown," (DEIS v. I, page 3-79). However, according to the *Canadian Journal of Otolaryngology*, just 120 dB exposure can injure the ear. The Final EIS should acknowledge ear damage and return the minimum flight level to 5000 feet AGL to prevent such damage.

Within the DEIS, we have not found any information on the decibel level of a supersonic jet flying at 500 feet AGL or 1000 AGL. As documented by the Bureau of Land Management (DEIS v. II, A-25 and A-26), *supersonic flight already does occur* at 1000 feet AGL or even hundreds of feet AGL. "Annoy" and "startle," the words used in the DEIS, hardly describe the reactions of those exposed. "Terrify" is more accurate. I have experienced this myself while berry picking with a child a few miles east of the Fox 3 MOA, and I thought that

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a bomb had dropped nearby. (See Copper Country Alliance Scoping Comments.) The Final EIS should acknowledge that these events occur and will become more common, should quantify the noise level, should describe impacts to wildlife and humans, and should describe the ways that it proposes to address the problem of too-low supersonic flight.

MITIGATIONS:

- 1. Keep the minimum flight level at 5,000 feet AGL.** The proposed 500-foot AGL would put civil aviation in harm's way; disrupt wildlife at critical times; disrupt human activities such as subsistence, wildlife viewing, hiking, and paddling; and damage the ears of humans and wildlife.
- 2. Enforce restrictions on pilots flying Air Force jets.** Violations of minimum flight level, MOA boundaries, and supersonic flight minimums have been rampant. Somewhere, the system is breaking down. Restrictions and the consequences of violations should be emphasized before each flight. Flights should be closely monitored. Discipline should be swift and certain. Foreign pilots who violate restrictions should be sent home.
- 3. Conduct any supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.**
- 4. Create a civilian oversight group with members selected by affected communities and interest groups.** Meet at least quarterly to exchange information. Fund the meetings and participants' meeting-related expenses.
- 5. Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas.** Solicit and take the advice of biologists in the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the Bureau of Land Management.
- 6. Establish a no-flight zone over the Delta and Gulkana Wild and Scenic Rivers and 10 miles on each side of them.** This means no flights, at any altitude.
- 7. Establish a no-flight zone over the Denali and Richardson highways, and 10 miles on each side of them.** This means no flights, at any altitude.

Thank you for this opportunity to comment and for planned future opportunities.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry, Volunteer Staff

N0035

Ruth McHenry, Volunteer Staff
Copper Country Alliance
HC60 Box 306T
Copper Center, AK 99573
907-822-3644

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[REDACTED]

From: William (Bill) Glanz [REDACTED]
Sent: Monday, July 02, 2012 4:33 PM
To: ALCOM J08 Admin Box
Subject: EIS

I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.
Thanks William L. Glanz Central, Alaska [REDACTED]

N0037

[REDACTED]

From: Wellwood Center [REDACTED]
Sent: Tuesday, July 10, 2012 2:59 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

Re: JPARC Modernization and Enhancement EIS

ALCOM Public Affairs:

I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.

The Delta and Gulkana Wild and Scenic Rivers, the beautiful and peaceful Tangle Lakes, the Denali Highway itself with its wild and expansive vistas, all are places dear to the souls of many people, both those who live in this area and those who visit, who find these regions valuable beyond price for the increasingly rare opportunities they give us to experience the world as it was created.

In the military's honorable quest to protect us, let's not damage those things that are truly worth protecting.

Thank you for your thoughtful consideration of these concerns.

--Dave Wellman
Business Owner (Wellwood Center Bed and Breakfast) Board Member (Wrangell Institute for Science and Environment, Copper Country Alliance) Executive Director (Wellwood Conservancy)
Retired science teacher (Kenny Lake School)

N0038

[REDACTED]

From: Coalition for Susitna Dam Alternatives [REDACTED]
Sent: Thursday, July 05, 2012 5:53 PM
To: ALCOM J08 Admin Box
Subject: Public Comment on Draft EIS for Modernization and Enhancement JPARC

7/5/12

Board of Directors
Coalition for Susitna Dam Alternatives (CSDA)

In the best interests of the public, CSDA wants to point out that under Cumulative Impacts, the draft has not mentioned the proposed Susitna Dam. This should be done. Include the following:

Proposed Susitna-Watana Hydroelectric Project

This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide and will be a focal point for increased human presence in the project area.

--
Phone contact:
907 733 5400

Website:
www.susitnadamalternatives.org

N0039

[REDACTED]

From: Pamela Miller [REDACTED]
Sent: Monday, July 09, 2012 12:43 AM
To: ALCOM J08 Admin Box
Cc: Jenna Hertz; [REDACTED]
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: NAEC JPARC Final Comments 7-9-2012.pdf

Please find our organization's comments, attached.

Pamela A Miller
Arctic Program Director
Northern Alaska Environmental Center
830 College Road
Fairbanks AK 99701
(907)452-5021 x24
(907)441-2407 (cell)
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N0039



July 9, 2012

Lieutenant General Dana Atkins
ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506
Via E-Mail: alcom.j08@elmendorf.af.mil
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission

Dear Lieutenant General Atkins,

The Northern Alaska Environmental Center (NAEC) thanks you for the opportunity to submit comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement (EIS) on behalf of our organization and its members. Our non-profit conservation organization promotes conservation of the environment and sustainable resource stewardship in Interior and Arctic Alaska through education and advocacy. We have over 1,500 members most of whom live, work, and recreate in the areas that will be affected by the proposed JPARC activities.

Recommended Alternative

Based on the alternatives listed in the proposal thus far, we recommend the no action alternative. We will address in more detail some particular issues that affect the quality of life of Fairbanks members and elsewhere in the Interior of Alaska, which primarily involve the FOX 3 and Paxson MOA addition, Tanana Flats Training Area Roadway Access and expansion of the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Area. We also recommend consideration of a new alternative that would decrease level of existing impact in the national conservation areas which include preserve, refuge, and wild and scenic rivers, as well as throughout the Yukon River watershed.

FOX 3 MOA and Paxson MOA

The eastern Alaska Range is an important area to many of our members, who spend considerable time deep in the mountains. Many have cabins within FOX 3 and within the additions. Lowering AGL's from 5,000 to 500 feet is a dramatic change and one that has negative impacts to various user groups and potential impacts to wildlife. Planes flying at an altitude of 500ft would produce cumulative impacts to people and fish and wildlife from noise disturbance including human health and wildlife reproduction and energetic stresses, impacts to sport and subsistence hunting, fishing, and other activities, effects on federal and state conservation areas and other public lands, wild lands and wilderness values including solitude and intact ecological system integrity, recreation and tourism, effects on bush and commercial flight safety, and air and water quality impacts. We are also concerned

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about the effects on Pacific salmon, migratory birds, marine mammals, and other wildlife that migrate from the Gulf of Alaska to sub-arctic and arctic habitats and may be affected by the Gulf of Alaska Temporary Maritime Activities Area.

Wildlife

As the EIS states, the Fox 3 MOAs and the new Paxson MOA include some of the largest hunting grounds for caribou as well as lambing and rutting areas for caribou and Dall sheep. It is vital that mitigation measures and flight restrictions be put into place to protect calving grounds, lambing areas, and rutting areas indicated in Figure 3-5 and 3-6. We support the establishment of a minimum overflight altitude of 3,000 feet AGL over the Delta and other Caribou Herd calving areas from May 15 to June 15. Judging by Table 3-11, not much caribou habitat has been spared in the Expanded Fox 3 MOA as 94% of the airspace consists of caribou habitat. We recommend measures to reduce this to 75% or less to protect this vital subsistence resource. The EIS only cites one study of the impacts on Dall Sheep. One study is inadequate. In terms of wildlife, NAEC believes Alternative E superior to Alternative A because it impacts less acreage of wildlife habitat. The No Action Alternative is our preferred alternative.

The EIS should also consider impacts on smaller, less iconic animals and migratory birds. Figure 3-7 is inadequate in showing the diversity of Migratory Waterfowl Habitat underlying the Fox 3 and Paxson MOAs. Since the EIS states that studies have shown that the visual aspect and peak noise level (Lpk) of overflights diminish rapidly with increasing altitude of overflight, we recommend that you raise the 500 foot AGL to at least 1,000 feet in this critical waterfowl area.

Hunting and Recreation

Hunters are perhaps the most common user group throughout the eastern Alaska Range. AGL's of 500 feet will certainly impact the experience of their hunt -- from the loss of a wilderness experience to the potential and unpredictable herd scattering that could occur when an aircraft traveling at or near mach speeds nears by. The proposal would affect recreational visitors to the Denali Highway -- including its surrounding public lands-- which is a favorite area to bring the important tourism visitor sector "visiting friends and relatives" as well as independent travelers and others. NAEC urges the Air Force to consider limiting air traffic during the months that ADF&G data has shown high visitor use and hunter success (namely mid-August, late September, and end of October to early November). The Paxson MOA would certainly make operations more difficult for local pilots and their clients, wildlife, and ground travelers.

Mountaineering

Mountaineering is another common use for which lowered AGL's and increased MOA's would bring negative impacts. Sonic booms from jets have been known to trigger avalanches on slopes that otherwise would remain stable for mountaineers. In addition, jets flying so close to mountaineers -- who can often be in serious situations in the first place -- presents unnecessary stresses, compromises safety, and also greatly detracts from the experience of solitude which is best exemplified in our great mountain ranges. Such low AGL's may also pose problems for bush pilots who would normally be flying under the MOA's, adding extra expense to traveler's budgets if they are required to add more miles to their flight plans or simply not be able to go. We recommend that the EIS include an analysis of such comments and explain the process for the public to provide documentation of such events.

N0039**Special Areas**

We are especially concerned about this expansion southward to the Lake Louise area and farther eastward on the Denali Highway. In addition to the greater Eastern Alaska Range, there would be substantial impacts to the Tangle Lakes – a very popular birdwatching, camping, hunting, fishing, and paddling destination not currently affected by any MOAs. The proposed 500 foot AGL's would certainly alter the experience of users there, as well as potential stresses to the Nelchina Caribou Herd, which relies on that region for wintering habitat. Many of our members have publicly spoken out about designating the area as a State Wildlife Refuge. The proposed 500 foot AGL's are not compatible with that type of use and land management. We recommend that Tangle Lakes be designated an avoidance area as Lake Louise is proposed to be to minimize impact on residents. This area also includes the Tangle Lakes Archeological District as well as the Delta National Wild & Scenic River.

Noise Pollution

In Table 1-10 of the EIS, the FOX 3 MOA and Paxson MOA are noted to have potential for significant adverse impacts on socioeconomics, noise, safety and land use. Under Alternative A, the noise pollution in the Paxson MOA would increase substantially, from 37 to 54 dB L and noise pollution in FOX 3 MOA would increase from 29 to 49 dB L. In Alternative E, the Paxson levels would increase from 37 to 54 dB L and Fox from 39 to 50 dB L. For these reasons, we do not find that the benefits outweigh the risks in the proposed plan for the addition to FOX 3 and MOA, and therefore request No Action be taken regarding these areas. The military already controls large swaths of airspace and could certainly find a way to use existing resources to fit their mission.

We request that No Action be taken regarding the proposed plan for a Paxson MOA.

Tanana Flats Training Area Roadway Access

The Tanana River is a tremendous resource near and dear to the inhabitants of Alaska's Interior. It is a major tributary of the Yukon River and a vital salmon subsistence river, waterfowl corridor, and transportation corridor for recreationalists and local residents of the interior.

Wetlands and Water

Table 1-10 of the EIS notes that the Tanana Flats Training Area Roadway Access comes with the potential for significant adverse impacts on physical resources including soils and permafrost, water resources, biological resources, and wetlands. We are concerned about potential impacts of the proposed roadway project on the delicate biological balance of this river downstream. Specifically, as the EIS admits, hydrologic studies are needed to ensure that culverts installed along the proposed roads would not produce a discernible change in the hydrologic flow regime of the area. We ask that you consider the potential for significant adverse impacts on subsistence for this project.

The area surrounding the Tanana is wetlands-rich. Sixty-five percent of the Tanana Flats Training Area is wetlands and special care must be taken to preserve the ecosystem integrity of this area to mitigate impacts downstream. Detailed wetlands surveys should be required before this project moves forward. We urge developers to follow the recommended site selection criteria and BMPs in section

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3.8.6 to reduce impacts on water and wetland quality. Sensitive areas for Raptors should be included in the list of criteria developed to reduce adverse effects on page 3-381

Living/Recreating on the Tanana

Many of our members canoe and motor between Fairbanks and Nenana as a recreational and subsistence activity. The population of Fairbanks uses this area heavily for summer salmon fishing and fall moose hunting. Members living on this stretch of the river have complained of shocking noise pollution and disturbance from what they have described as “bombs” in the Tanana Flats Training Area on the East Bank of the river. People on the West Bank of the Tanana should be considered in the Affected Environment section of Socioeconomic impacts.

Yukon River Watershed Impacts

The upper Yukon River watershed already has a high concentration of MOAs (Yukon 2, 3, 4, 5) that can result in adverse impacts to wildlife, recreation, and subsistence resources and users and noise disturbance that is incompatible with the purposes of Yukon-Charley National Preserve, Yukon Flats National Wildlife Refuge, part of Arctic National Wildlife Refuge, and the Birch Creek, Charley, and 40-mile Wild & Scenic Rivers, and we recommend consideration of a new alternative that would decrease level of existing impact in the conservation areas and throughout the Yukon River watershed.

Realistic Live Ordnance Delivery

We believe the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Facility is also unnecessary. We are opposed to additional live ordnance designations and feel those activities should be limited to existing facilities. We have heard from members whose planned expeditions to exit the peaks of the Eastern Alaska Range have already been thwarted upon learning about the restrictions that made it illegal to float down Delta Creek. We are opposed to any additional restrictions that undermine Alaskans’ ability to enjoy their surrounding landscapes.

General Comments

Document and Maps

The DVD copies of this document were fairly easy to navigate and we appreciate the attention put to that. We similarly appreciate Figure 3-10 (Land Status and Special Use Areas in the Fox 3 MOA Expansion and New Paxson MOA Proposal area) in that it delineates land use categories but feel the EIS could go much farther in clearly identifying conservation areas by their individual place names, rather than slight shifts in colors and dash marks. Because the proposed areas encompass such a complicated patchwork of land designations, we recommend that all maps show the boundaries of federal and state conservation areas. This should include parks, refuges, conservation areas, recreation areas, National Wild and Scenic River, proposed wilderness areas, state habitat areas. We believe this will help the public understand incompatible uses and to assess impacts as well as better assess mitigation such as additional seasonal restrictions to avoid effects on wildlife reproduction, migrations, and other sensitive activities.

Energy Conservation and Renewable Energy:

Energy conservation is a core value of our organization. We support and applaud the plan’s efforts to reduce fuel consumption and increase efficiency. We applaud the inclusion of figures like 3-13 that

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shows the Renewable Resources in the Fox 3 MOA and New Paxon MOA Proposal Area, although we do not sense meaningful integration of this data into the EIS or purpose of the expansion. We do not, however think that the most impactful savings can come at the cost of AGL reductions to 500 feet, a height that is jarring and disruptive to wilderness qualities of solitude and quiet that we prize Alaska's remote areas for.

If the military is truly concerned with energy efficiency, it seems that they should do everything in their power to base flights more locally. There is much energy used getting planes to the Yukon-Charlie area from Fairbanks and Anchorage. If the Eielson Air force Base was moved to Anchorage, there would be a huge increase in fuel costs associated with getting the planes to interior-based flight areas. We request that the cumulative impacts of this potential move be addressed in the EIS.

Noise Pollution

We believe additional night hours on existing MOA's will pose great impacts to residents, recreational and subsistence users and wildlife. We ask that the Air Force exercise some restraint and limit its noise impacts on these places by using existing policy regarding night hours. None of the alternatives adequately address the cumulative impacts of the existing MOA night flying disruptions. In the materials submitted to the public, there is no definition of what a "documented noise sensitive area" is or what restrictions, if any, might be associated with these areas.

Flight Numbers and Hours

While there are alternatives described with different extensions of Proposed Night Joint Training for all training purposes versus major flying exercise, there is no indication of the total number of flights anticipated for each alternative. Alternatives should also be considered that may reduce flight hours or numbers of flights in existing MOAs in consideration of the cumulative impacts.

Thank you for taking the time to read our thoughts on this important matter. We hope to be involved in the future, as do many of our colleagues.

Sincerely,



Jenna Hertz,
Arctic Grassroots Coordinator



Pamela A. Miller
Arctic Program Director

N0040

[REDACTED]

From: Mackenzie Dickson [REDACTED]
Sent: Monday, July 09, 2012 2:01 PM
To: ALCOM J08 Admin Box
Cc: Randy Hansen; Sean Elliott
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: Alaska JPARC Comment.pdf

Good Afternoon,

Attached is EAA's comments to the proposed JPARC expansion.

Respectfully,

Mackenzie Dickson
Government Relations Intern

EAA - *The Spirit of Aviation* - www.eaa.org

[REDACTED]

See you at EAA AirVenture Oshkosh, July 23 - 29, 2012, www.airventure.org