
U.S. ARMY GARRISON FORT WAINWRIGHT, ALASKA

REAL PROPERTY MASTER PLAN FINDING OF NO SIGNIFICANT IMPACT AND PROGRAMMATIC ENVIRONMENTAL ASSESSMENT



May 2017

FINDING OF NO SIGNIFICANT IMPACT

The National Environmental Policy Act of 1969 (NEPA) (42 United States Code §4321 et seq.) requires federal agencies to consider the potential environmental impacts prior to undertaking a course of action. Within the United States (U.S.) Department of the Army (Army), NEPA is implemented through regulations promulgated by the Council on Environmental Quality (CEQ; 40 Code of Federal Regulations (CFR) §§1500–1508) with supplemental requirements provided under 32 CFR §651, Environmental Analysis of Army Actions, and Army regulations. In adherence with NEPA, 40 CFR §§1500–1508, and 32 CFR §651, the U.S. Army Garrison Fort Wainwright, Alaska (USAG FWA) prepared a programmatic environmental assessment (PEA) to assess the potential environmental impacts from implementing the Real Property Master Plan (RPMP) at Fort Wainwright, Alaska.

Description of Proposed Action

The U.S. Army Garrison Fort Wainwright, Alaska proposes to implement a Real Property Master Plan for the Fort Wainwright Army Installation. The Directorate of Public Works (DPW) Master Planning Division developed a long-term plan to provide the facilities and infrastructure required to support both current and future mission activities at Fort Wainwright. The RPMP consists of several components that resulted from the visioning, analysis, and design phases of the planning process and includes the Capital Investment Strategy, Vision Plan and Installation Planning Standards, Short-Range Component and Long-Range Components. Taken together, these products constitute the RPMP and serve as a regulating plan that flexibly governs the management of existing and required facilities and installation development. Their collective purpose is to guide development on the installation to ensure that it meets the planning vision. The RPMP, however, is not a static, inflexible, single plan; it is a living document consisting of a compilation of components unified by a common vision in sync with evolving missions, security requirements, and technology.

The RPMP establishes long-term strategies to guide the physical development of Fort Wainwright. It provides areas to accommodate new mission growth, provides additional administrative, storage, and parking facilities, and incorporates known design requirements that were identified during the planning process. The plan maintains the installation's design vision in creating an energy-efficient installation with compact districts, versatile buildings, and interconnected transportation networks. The plan will be reviewed on an annual basis to address necessary mission changes. This plan also incorporates Best Management Practices (BMPs) and Standard Operating Procedures (SOPs) that, when applied, further reduce potential environment impacts resulting from implementation of the RPMP. The RPMP is composed of five components, which are: (1) the Vision Plan, which includes the Framework Plan and Network Plans; (2) the Installation Planning Standards; (3) the ADPs, which include Regulating Plans, Transportation Plans, and Illustrative Plans as ADP components; (4) the Capital Investment Strategy; and (5) the Plan Summary.

The Garrison Commander, Master Planning, and Environmental Staff will be able to utilize the RPMP and PEA as tools to begin the design and evaluation of proposed projects. Through this, it would be determined if the project impacts are already fully captured in this PEA or if additional NEPA analysis will be required for the action to proceed. This flexibility would increase Fort Wainwright's ability to meet mission objectives and implementation of the RPMP while conforming to applicable environmental requirements.

Alternatives Considered

The purpose of the USAG FWA RPMP is to meet Department of Defense (DoD) and Army instructions and regulations. Under UFC 2-100-01, *Installation Master Planning*, which provides guidance for RPMP development at installations, USAG FWA is required to prepare and implement an RPMP that addresses sustainable planning; natural, historic, and cultural resource management; healthy community planning; defensible planning; capacity planning; area development planning; network planning; form-based planning; facility standardization; and plan-based programming.

CEQ regulations require inclusion of the No Action Alternative in an EA. The No Action Alternative serves as a baseline against which the impacts of the Proposed Action and alternatives can be evaluated. As a result, two alternatives were evaluated in detail:

- (1) Alternative 1 - the Proposed Action, which adopts and implements the Fort Wainwright RPMP.
- (2) Alternative 2 - the No Action Alternative, which continues implementation based on existing planning principles and development goals.

Preferred Alternative

The Army's preferred alternative is Alternative 1 – adopting the RPMP.

Discussion of Anticipated Environmental Effects

In the PEA, which is attached and incorporated by reference into this Finding of No Significant Impact (FNSI), the potential effects from implementing the Proposed Action under Alternative 1 and the No Action Alternative were fully analyzed for the following resources: Air Quality; Airspace; Biological Resources; Cultural Resources; Energy and Utilities; Geology and Soils; Land Use; Noise; Public Health and Safety; Recreation Resources; Socioeconomics and Environmental Justice; Solid and Hazardous Waste and Pollution; Transportation and Traffic; and Water Resources. Table FNSI-1 summarizes the environmental impacts associated with each alternative for each resource evaluated in the PEA. A detailed discussion of potential effects is presented in Chapter 3.0 of the PEA. A summary of proposed mitigation measures, SOPs and BMPs is provided after the table.

Table FNSI-1. Summary of Environmental Impacts

Resource/Issue	Proposed Action	No-Action Alternative
Air Quality	Short term: minor to moderate through use of BMPs and SOPs Long term: beneficial	Short and long term: minor to moderate through use of BMPs and SOPs
Air Space	Short term: no impact Long term: none to beneficial	Short and long term: no impacts
Biological Resources	<u>Vegetation</u> — Short term: minor to moderate through use of BMPs and SOPs Long term: minor to beneficial <u>Wildlife, Fisheries, and Sensitive Species</u> — Short term: minor to moderate through use of BMPs and SOPs Long term: moderate to beneficial <u>Wetlands and Critical Habitats</u> — Short term: minor to moderate through use of BMPs and SOPs. Long term: none to minor	Same as those for Proposed Action through use of BMPs and SOPs
Cultural Resources	Short and long term: minor to moderate through use of BMPs and SOPs	Same as those for Proposed Action through use of BMPs and SOPs
Energy & Utilities	Short term: none to minor Long term: minor to beneficial	Short and long term: minor to moderate
Geology & Soils	Short term: minor to moderate through use of BMPs and SOPs Long term: minor to beneficial	Same as those for Proposed Action through use of BMPs and SOPs
Land Use	Short term: none to minor through use of BMPs and SOPs Long term: none to beneficial	Short term: none to minor through use of BMPs and SOPs Long term: no impacts
Noise	Short term: minor through use of BMPs and SOPs Long term: beneficial	Short and long term: minor through use of BMPs and SOPs
Public Health & Safety	Short term: none to minor through use of BMPs and SOPs Long term: beneficial	Short and long term: none to minor through use of BMPs and SOPs
Recreation Resources	Short term: none to minor Long term: beneficial	Short term and long term: no impacts
Socioeconomics & Environmental Justice	Short and long term: minor to beneficial	Same as those for Proposed Action

Resource/Issue	Proposed Action	No-Action Alternative
Solid & Hazardous Waste and Pollution	Short term: none to minor through use of BMPs and SOPs Long term: beneficial	Short and long term: none to minor through use of BMPs and SOPs
Transportation & Traffic	Short term: minor Long term: beneficial	Short term: minor Long term: minor to moderate
Water Resources	Short term: minor to moderate through use of BMPs and SOPs Long term: no impacts	Same as those for Proposed Action through use of BMPs and SOPs

*SOPs & BMPs for reduction of adverse impacts are outlined in PEA Appendix B

The Proposed Action would not result in significant impacts to any of the resource areas; however, dependent on the resource area, some mitigation measures would be needed as a result of minor to moderate impacts. For example, introduction of new elements into the Ladd Field National Historic Landmark (NHL) and Ladd Air Force Base (AFB) Cold War Historic District, or extending the South Runway for Unmanned Aerial Systems (UAS) operation could result in minor to moderate impacts to these historic properties. Adhering to the SOPs, BMPs, the Integrated Cultural Resources Management Plan (ICRMP), Army Regulations 200-1, National Historic Preservation Act (NHPA) Section 106 procedures codified in 36 CFR 800, and design guidelines agreed upon by Fort Wainwright, its stakeholders, and the State Historic Preservation Office (SHPO) would allow the Ladd Field NHL and Ladd AFB Cold War Historic District to retain historic significance and integrity. Thus, implementation of the RPMP would not result in significant impacts under NEPA. While execution of specific projects within the plan may be found to constitute adverse effects under Section 106 of the NHPA, USAG FWA would perform consultation to determine what mitigation is necessary in response to a Section 106 adverse effect on the Ladd Field NHL and Ladd AFB Cold War Historic District. Likewise with wetlands and or waters of the US as defined the Army Corps of Engineers Regulatory Division, if siting of specific proposed projects were to result in minor to moderate adverse impacts, mitigation measures would be required to offset the impacts and replace the lost functions and values. Specific mitigation measures would be determined during the Clean Water Act 404 permitting process. Demolition and construction projects would be conducted in accordance with Fort Wainwright's Storm Water Pollution Prevention Plan (SWPPP) to avoid or minimize potential effects from stormwater runoff to water and soil resources.

Standard measures, including SOPs and BMPs, would be employed to reduce or minimize potential impacts. In recent years, both the USAG FWA and the U.S. Army Alaska (USARAK) have produced a variety of NEPA analyses evaluating a number of actions, including Army force transformation efforts, the addition of Soldiers and new equipment, a general increased use of training lands, and range development projects throughout USARAK ranges. These documents have also identified many regulations, policies, management programs, SOPs, BMPs, and specific mitigation measures used to avoid, minimize, and mitigate various adverse impacts to the affected environment at Fort Wainwright. The SOPs, BMPs, and mitigation measures

developed as a result of these actions are ongoing and will continue as part of the baseline management employed by the USAG FWA and USARAK on Army-owned and controlled lands, including all actions associated with the implementation of the RPMP. These environmental stewardship guidelines are presented in Appendix B of the PEA.

Cumulative Effects Analysis

The Army conducted a cumulative impact assessment to determine whether the combined effects of each alternative along with other projects in the region might be significant. After review of past, present, and reasonably foreseeable future actions occurring in the same region of influence as the Proposed Action, the Army determined that none of the alternatives would result in cumulative impacts that were significant for any of the resource areas.

Public Comment

The PEA and Draft FNSI were made available for review and comment for 30 days from March 13 - April 12, 2017. The documents were made available for review at: <https://www.wainwright.army.mil/index.php/about/environmental>; the Noel Wien Public Library located at 1215 Cowles Street, Fairbanks, Alaska; and distributed to appropriate agencies, Tribal organizations, and other interested parties. The Army received comments from the U.S. Fish and Wildlife Service, the National Park Service, and the State Historic Preservation Office; which are presented with Army responses in Appendix A of this FNSI. The comments focused on clarifying language and the incorporation of additional references. In total these comments were not considered substantive and the edits have been incorporated to the attached PEA.


Conclusion

Based on the review of the information contained in the PEA, the USAG FWA has determined through this FNSI that the Proposed Action—implementing the RPMP—would not significantly affect the quality of the environment within the meaning of NEPA Section 102(2)(C). The preparation of an environmental impact statement for the Proposed Action is not required.

Point of Contact

For further information, please direct requests to Mr. Matthew Sprau, Directorate of Public Works, ATTN: IMFW-PWE (M. Sprau), 1046 Marks Road, Fort Wainwright, AK 99703-4500.

APPROVED BY:


Sean C. Williams
Colonel, US Army
Commanding

19 MAY 2017
Date

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APPENDIX A

FORT WAINWRIGHT PEA AND DRAFT FNSI COMMENTS AND ARMY REPONSES

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#	Org.	Reviewer	Section	Location	Topic	Comment	Response
		Name or Initials	Section number from text	Location within section	Resource area, sub resource area	Comments are in same order as identified in submission.	
1	USFWS	Henszey, Robert		N/A	Threatened and Endangered Species	There are no threatened or endangered species in the project area, thus the Service does not expect project-related activities to adversely impact listed species. This letter constitutes informal consultation under the Endangered Species Act. Preparation of a Biological Assessment or further consultation regarding this project is not necessary at this time.	Thank you for your comment.
2	USFWS	Henszey, Robert	Sec. 3.4.2.1	Pg. 3-20	Eagle Nests	For projects near potential eagle nesting habitat, we recommend conducting nest surveys in the early spring prior to construction when the nests are active and easily identified. If an eagle nest is discovered within a half-mile of the project site, please contact our office for further assistance.	Fort Wainwright environmental conducts Bald and Golden Eagle nest surveys on Army-managed lands and incorporates this information into its Integrated Natural Resources Management Plan as well as provides it to the appropriate groups, including construction, engineering, and aviation. At this time, no Bald or Golden Eagle nest has been identified in the region of interest identified for the Master Plan Programmatic Environmental Assessment. The Army will continue to coordinate with the USFWS if a Bald or Golden Eagle nest is found and follow the applicable procedures.
3	USFWS	Henszey, Robert	N/A	N/A	General	We applaud USAG FWA effort and foresight to plan for the future growth at the Fort Wainwright installation. Service policy regarding impacts to fish and wildlife habitat includes first avoiding, then minimizing, and finally compensating for any remaining unavoidable impacts. We appreciate the proposed wetlands avoidance and minimizations measures.	Thank you for your comment.

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4	USFWS	Henszey, Robert	Table 3-1 and Sec. 3.4.1 and 3.4.2.1	Pg. 3-17; Pg. 3-20	Wetlands	The Service finds the qualitative assessment of the affected environment sufficient for the PEA at this time with the exception of wetlands. The Service recommends the addition of Wetland Resources as a separate topic in Table 3-1 and 3.4.2.1 Environmental Consequences – Proposed Action for a qualitative analysis of impacts to resources. Wetlands are identified as “sensitive habitat” on page 3-17, and therefore should be assessed separately.	The “sensitive habitat” section described in section 3.4.1 was erroneously labeled and should have been titled wetland resources. This section does act as the qualitative analysis for wetlands resources as the information contained within this section focuses on that subject area. The section title has been changed to “wetland resources” in section 3.4.1 and under the proposed action analysis in 3.4.2.1. In addition, Table 3-1 has been updated with a scenario that could be considered significant if it “(g) results in an unpermitted loss of jurisdictional wetland function.”
5	USFWS	Henszey, Robert	Table 3-1	Pg. 3-2	Birds	We suggest including the Migratory Bird Treaty Act (MBTA) in the Significance Threshold for Biological Resources in Table 3-1. A violation of the MBTA is considered significant.	This language has been added to Table 3-1.
6	USFWS	Henszey, Robert	Appendix B	Pg. B-2; B-6	Construction Staging	The Service recommends including Best Management Practices (BMPs) for temporary material staging. Construction projects involving high mounds of gravel or dirt can attract nesting bank swallows. If material is removed before the nesting season ends, nests can be destroyed. We recommend avoiding creating stockpiles with steep slopes either by storing or by removing material, and when practicable store the material at a low grade so the pile is not an attractant to bank swallows.	Fort Wainwright agrees with this recommendation and does take steps to reduce the likelihood of bank swallow nesting in soil stockpiles on Post, including the recommendations listed here. The following language has been added as a Best Management Practice for Soil Resources under Construction Staging Appendix B; “Construct soil stockpiles with gradual slopes and in a manner that reduces the potential for erosion as well as reduce the attractant for bank swallows constructing nests in the stockpiles.”

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7	USFWS	Henszey, Robert	Appendix B	Pg. B-2	Erosion Control Material	While there is no specific reference to the use of erosion control materials that contain plastic material, we would like to comment on the use of such materials. The Service does not recommend plastic degradable netting for use in any aspect of a proposed project for erosion control. Prior to degradation, the netting can entangle wildlife, including amphibians, birds, and small mammals. In addition, because the plastic netting is degradable (not biodegradable), once the plastic does degrade (which takes many years, especially in cold climates) it does not decompose into biologic components of the soil. Instead, the plastic degrades into small fragments which are blown or washed into waterways creating a toxic ingestion hazard for aquatic wildlife for many years. To minimize wildlife entanglement and plastic debris pollution, we recommend using plastic-free erosion and sediment control products such as netting manufactured from 100% biodegradable, non-plastic materials like jute, sisal, or coir fiber. We do not recommend plastic products, regardless of their degradability, for use in reclamation, unless there are plans to remove the product before it breaks down and disperses into the environment. We also do not recommend straw bales as they can harbor invasive weed seeds. Even if sourced from Alaska, species that are non-invasive in one ecoregion can become noxious or invasive in another.	This recommendation is addressed in a BMP under wetland resources Appendix B, last BMP. We will continue to take appropriate steps to promote the use of biodegradable erosion control materials for reclamation efforts.

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8	USFWS	Henszey, Robert	Appendix B	Pg. B-3	Fish Passage	<p>For all fish-bearing waterbodies, and especially for new construction, we encourage Fort Wainwright to go beyond the minimum hydraulic design for fish passage, and incorporate at least some floodplain connectivity. Floodplains are an important component of the aquatic system with many benefits beyond enhancing fish habitat. When considering the range of floodplain connectivity options (U.S. Forest Service 2008, Figure 2.5) from no connectivity (simple high discharge passage) to full functioning of all processes (full-span crossing), the Service recommends a stream simulation crossing at least slightly wider than the bankfull width to maintain minimal floodplain connectivity and to offer dry passage for smaller terrestrial animals. Box culverts with full-metal inverts, pipe-arches, and horizontal ellipse pipes are a few potential options to consider for crossings, which offer wider width to height ratios than standard round culverts.</p> <p>We appreciate USAG FWA proposing to use culverts with a diameter of 120% of the bankfull width, which would provide minimal floodplain connectivity if the culvert was buried to a depth equaling the radius of the culvert. However by our calculation, the chord length for a culvert buried only 20% of its diameter would result in 96% of the bankfull width inside the culvert. We recommend either burying the culvert to the depth of its radius, or using a larger diameter culvert to compensate for a shorter chord length when the culvert is not buried to the depth of its radius.</p>	The referenced BMP under Wildlife and Fisheries in Appendix B has been modified to read "Culverts installed in fish bearing streams will be sized appropriately to maintain natural connectivity, stream depth and velocity." This would allow Fort Wainwright flexibility in fulfilling floodplain connectivity given the specific circumstances of the water channel.

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9	USFWS	Henszey, Robert	Appendix B	Pg. B-7	Wetland and Riparian Vegetative Buffers	The Service recommends following the multiagency guidelines for riparian and wetland buffers in Interior Alaska (Alaska Department of Fish and Game et al. 2002). A minimum 100-foot buffer along all anadromous waterbodies is recommended.	<p>Although Fort Wainwright agrees with the importance of buffering riparian areas and wetlands, the Army is not able to commit to a 100-foot buffer along all wetlands and waterbodies as we could not locate a direct statutory requirement that supports this distance. Fort Wainwright will continue to implement appropriate riparian buffer distances, which may be shorter or longer than the recommendation, so as to preserve the benefits of riparian areas on lands under its management.</p> <p>The list of BMPs/SOPs in Appendix B has also been updated in the following sections to remove hard-fast distances and provide flexibility given the specific circumstances. They are as follows: Appendix B, page B-5, 7th BMP will now read: “Silt fences, silt curtains, or other diversion or containment structures shall be installed to contain sediment and turbidity at the work site in accordance with the applicable storm water pollution prevention plan.” Appendix B, page B-6, 2nd BMP will now read “To the extent practical, locate construction staging areas outside of wetlands.” Appendix B, page B-8, 1st BMP will now read “Retain appropriately sized buffers along waterbodies, including those with essential fish habitat and anadromous streams.” Appendix B, page B-9 5th BMP will now read “Avoid siting, to the extent practical, projects in higher functioning wetlands such as riparian areas or those containing rare or sensitive species.” Appendix B, page B-10, 4th BMP will now read “Limit impacts to anadromous streams by placing pads and vault/junction boxes an appropriate distance away from waterbodies and wetlands containing anadromous fish.”</p>

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10	USFWS	Henszey, Robert	Appendix B	Pg. B-7	Invasive Species	We recommend developing and implementing an invasive species plan on post. <i>Prunus padus</i> (European bird cherry) is considered invasive and should no longer be planted and all decadent mature trees should be replaced with desirable, noninvasive species, such as <i>Prunus maackii</i> or some <i>Malus</i> species (see recommendations in UAF's 2010 Campus Invasive Plant Management Plan at http://www.uaf.edu/files/ces/cnipm/otherresources/UAF_plan.pdf). Additionally, <i>Prunus virginiana</i> (Red chokecherry), which may be present on post, may also be invasive, but more research is needed to determine its invasiveness. In the meantime, we recommend not planting this species on post.	Fort Wainwright appreciates the link provided for information about invasive species. We've integrated invasive species management into our Integrated Natural Resources Management Plan. In addition, a Fort Wainwright "plant palette" was developed for the Real Property Master Plan which does not include any <i>Prunus</i> species but does suggest <i>Malus</i> spp. (Crabapples). The plant palette can be found in the Fort Wainwright Vision Plan.
11	USFWS	Henszey, Robert	Appendix B	Pg. B-10	Land Clearing	The Service recommends avoiding land clearing activities during the migratory bird nesting period https://www.fws.gov/alaska/fisheries/fieldoffice/an_chorage/pdf/vegetation_clearing.pdf . We also recommend following the multiagency guidelines for riparian and wetland buffers in Interior Alaska to avoid clearing and other disturbances along wetlands and fish-bearing streams (Alaska Department of Fish and Game et al. 2002).	Fort Wainwright provides the USFWS Region 7 recommendations for land clearing during migratory bird nesting season (1 May through 15 July) to all of its tenants and contractors performing land clearing activities during this time.
12	USFWS	Henszey, Robert	Appendix B	Pg. B-9	Structural Design	The Service encourages building designs outlined in 2.1.1 Vision Plan Goal 3 incorporate architecture designs unappealing to nesting birds. Cliff Swallows (<i>Petrochelidon pyrrhonota</i>) are prolific on the installation and proactively designing new structures that are not attractive to this species will be beneficial. Cliff swallows are a migratory species protected under the MBTA, and have been a source of frustration for Fort Wainwright. The nests are a concern because they are source of fecal matter and parasites. The Service cites USAG FWA Natural Resources Report 2011 as a good source of information for proactively excluding cliff swallow nesting.	Fort Wainwright appreciates this input and will continue to provide design considerations for buildings constructed on Post so as to reduce potential nesting sites on the buildings.

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13	NPS	Pederson Weinberger, Jennifer	General	N/A	Cultural Resources	Since this document will be used to help guide future planning within the NHL, we would recommend that the RPMP include additional references to the 2006 Army Installation Design Guide: Fort Wainwright, as well as the Integrated Cultural Resources Management Plan (ICRMP), as part of this planning framework as they are critical documents for ensuring the protection of historic properties on Fort Wainwright.	We've added these citations to the references list in Chapter 7.
14	NPS	Pederson Weinberger, Jennifer	Section 2.1.2.2	Pg. 2-11	Cultural Resources	Page 2-11; Subsection 2.1.2.2 North Post District ADP: Recognizing that the ADP for this district will focus on keeping the building height limited to two-three stories, is consistent with the Ladd Field National Historic Landmark, and we suggest that the document includes additional factors that will be considered when designing new buildings for this district and that are referenced in the Army Installation Design Guide: Fort Wainwright. We also suggest including a statement that proposed changes to the district will be done in consultation with the Cultural Resources Manager for guidance on appropriate considerations for new construction within and adjacent to the Ladd Field National Historic Landmark.	We've added the following language to subsection 2.1.2.2, "Proposed changes to the North Post District will be done in consultation with the Cultural Resources Manager for guidance on appropriate considerations for new construction, renovation, demolition and landscaping within and adjacent to the Ladd Field National Historic Landmark, per the <i>Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012</i> ; <i>Army Installation Design Guide: Fort Wainwright, 2006</i> ; <i>Unified Facilities Criteria DoD Building Code, 2016</i> ; and <i>Integrated Cultural Resources Management Plan, 2013</i> "
15	NPS	Pederson Weinberger, Jennifer	Section 2.1.2.2	Pg. 2-14, 2-15, 2-16	Cultural Resources	Pages 2-14, 2-15, 2-16; Subsection 2.1.2.2 North Post District ADP: Since the Short-Range, Mid-Range, and Long-Range plans for the North Post District propose the planting of trees within and adjacent to the Ladd Field National Historic Landmark, we suggest providing reference to Section 10 of the Army Installation Design Guide: Fort Wainwright. We also suggest including a statement that proposed changes to the district will be done in consultation with the Cultural Resources Manager for guidance on appropriate considerations for landscaping within and adjacent to the Ladd Field National Historic Landmark.	We've added the following language to subsection 2.1.2.2, "Proposed changes to the North Post District will be done in consultation with the Cultural Resources Manager for guidance on appropriate considerations for new construction, renovation, demolition and landscaping within and adjacent to the Ladd Field National Historic Landmark, per the <i>Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012</i> ; <i>Army Installation Design Guide: Fort Wainwright, 2006</i> ; <i>Unified Facilities Criteria DoD Building Code, 2016</i> ; and <i>Integrated Cultural Resources Management Plan, 2013</i> ."

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16	NPS	Pederson Weinberger, Jennifer	Section 2.1.2.3	Pg. 2-17	Cultural Resources	Page 2-17; Subsection 2.1.2.3 Ladd Airfield ADP: This district/zone encompasses the Ladd AFB Cold War Historic District and part of the Ladd Field National Historic Landmark. Of particular importance to the NHL is Building 1557, Hangar 1. Like Subsection 2.1.2.2, a goal of this section should be to preserve the heritage in this district and therefore we recommend referencing the ICRMP and Army Installation Design Guide: Fort Wainwright. We also suggest including a sentence that proposed changes will be done in consultation with the Cultural Resources Manager for providing guidance on actions within the Ladd Field National Historic Landmark to help preserve this heritage.	We've added the following language to subsection 2.1.2.3, "Proposed changes to the Ladd Airfield District will be done in consultation with the Cultural Resources Manager for guidance on appropriate considerations for new construction, renovation, demolition and landscaping within and adjacent to the Ladd Field National Historic Landmark, per the <i>Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012</i> ; <i>Army Installation Design Guide: Fort Wainwright, 2006</i> ; <i>Unified Facilities Criteria DoD Building Code, 2016</i> ; and <i>Integrated Cultural Resources Management Plan, 2013</i> ."
17	NPS	Pederson Weinberger, Jennifer		Pg. 3-25	Cultural Resources	Page 3-25: Ladd Field National Historic Landmark. Since the NHL nomination is a key source document for this section, we suggest including citation of the NHL nomination.	We've added the following citation to Section 3.5.1 Ladd Field National Historic Landmark "(NPS, 1984)" as well as added this to the reference list in Chapter 7.
18	NPS	Pederson Weinberger, Jennifer		Pg. 3-27; 1st paragraph	Cultural Resources	Page 3-27; 1st paragraph, last sentence: Among the key documents listed that "...would be utilized to avoid, minimize, or mitigate impacts to cultural resources during development, construction, operations, and maintenance..." we suggest adding the Army Installation Design Guide: Fort Wainwright with the other documents that are identified.	We've added the Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012; Army Installation Design Guide: Fort Wainwright, 2006; Unified Facilities Criteria DoD Building Code, 2016 citations to the referenced paragraph in section 3.5.2.1.
19	NPS	Pederson Weinberger, Jennifer		Pg. 3-27; 5th paragraph	Cultural Resources	Page 3-27; 5th paragraph: Since this paragraph is addressing the idea of introducing modern buildings and transportation networks within the NHL, we suggest including the Army Installation Design Guide: Fort Wainwright with the other documents that are identified.	We've added the Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012; Army Installation Design Guide: Fort Wainwright, 2006; Unified Facilities Criteria DoD Building Code, 2016 citations to the referenced paragraph in section 3.5.2.1.

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20	NPS	Pederson Weinberger, Jennifer	General	N/A	Cultural Resources	An overall comment: As often seen with NEPA documents, the application of the analysis section is not comparable with a Section 106 review process, e.g., the different definitions of “adverse effect” and how these might be “mitigated” under NEPA is not the same process under Section 106. Section 106 helps to inform the planning process, especially when specific to historic districts and buildings. To help a reader understand the next steps, perhaps it would be beneficial for the document to identify the Cultural Resources Manager’s role in implementing the Real Property Master Plan and how it integrates with the ICRMP.	Fort Wainwright appreciates this input and understands the importance of Section 106 informing the planning process. The following language has been added to section 1.5 “In addition, for projects with potential to adversely affect historic properties the Cultural Resources Manager will be involved in the planning and design to ensure that the projects are meeting the goals of the Integrated Cultural Resources Management Plan and that adverse effects are mitigated in accordance with the National Historic Preservation Act Section 106 process.”
21	NPS	Pederson Weinberger, Jennifer	Section 4.3.4	Pg. 4-6	Cultural Resources	Page 4-6; Subsection 4.3.4 Cultural Resources: Another example of where the NEPA and 106 could use some clarification as this subsection seems contradictory in that the first paragraph states “Proposed demolition and new construction...for Aviation Assets, and the Gray Eagle UAS, could diminish the overall integrity of setting, feeling, and association of the Ladd Field NHL and the Ladd AFB Cold War Historic District,” while the third paragraph states, “Combined with past, present, and reasonably foreseeable future actions discussed above, the impacts from Proposed Action would constitute minor, cumulative impact to cultural resources.” We suggest providing clarification so that the plan intent will be to follow the Army Installation Design Guide: Fort Wainwright and recognizing the need to avoid actions that would cause cumulative effects	In Section 4.3.4, the sentences “The combined impact of these actions has resulted in a moderate impact to the state’s collection of World War II and Cold War Resources,” and “These impacts could be determined minor to severe dependent on the location within the ROI and the cumulative effects,” were removed in the first paragraph in order to reduce conflicting statements since the remaining paragraphs in this section outline the anticipated impact severity. The existing “design guidelines” language in the 3 rd paragraph of Section 4.3.4 has been updated to reflect “ <i>Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012; Army Installation Design Guide: Fort Wainwright, 2006; Unified Facilities Criteria DoD Building Code, 2016.</i> ” The Army cannot guarantee the avoidance of actions that would cause cumulative effects to historic resources, but will continue to ensure that the Cultural Resources Manager will be involved in the planning and design to ensure that projects are meeting the goals of the Integrated Cultural Resources Management Plan and that adverse effects are mitigated in accordance with the National Historic Preservation Act Section 106 process.

#	Org.	Reviewer	Section	Location	Topic	Comment	Response
		Name or Initials	Section number from text	Location within section	Resource area, sub resource area	Comments are in same order as identified in submission.	
22	NPS	Pederson Weinberger, Jennifer	Appendix A	Pg. A-11	Cultural Resources	Appendix A, page 11, North Post District Vision and Goals: Under the “North Post District Key Assumptions” section, #6, we suggest adding to the sentence so that it reads “New projects will be developed in alignment with the regulating plan and building envelope standards, and in accordance with the Army Installation Design Guide: Fort Wainwright.	Fort Wainwright appreciates your input. The vision, goals, and assumptions in North Post ADP referenced in Appendix A were developed by an internal working group in 2014. At this time, the language cannot be changed in the ADPs in Appendix A as that was part of a separate contract and is considered complete. As outlined in Section 1.5, page 1-7 “The intent of this Real Property Master Plan (RPMP) Programmatic Environmental Assessment is to provide a holistic view and understanding of the potential environmental impacts resulting from implementation of the RPMP.” As this Real Property Master Plan is implemented and reviewed, the Environmental Division will ensure that the <i>Design Guidelines for Ladd Field World War II National Historic Landmark Fort Wainwright, Alaska, 2012</i> ; <i>Army Installation Design Guide: Fort Wainwright, 2006</i> ; and <i>Unified Facilities Criteria DoD Building Code, 2016</i> are integrated into project planning and design.
23	SHPO	Bittner, Judith E.	General	N/A	Cultural Resources	Following our review of the documentation provided and the letter from the NPS Alaska Regional Office, our comments mostly echo the comments provided by NPS. Specifically, that the document should reference the Army Installation Design Guide as well as the Integrated Cultural Resources Management Plan (ICRMP). It should also consult and reference, as appropriate, information from the NHL nomination. Finally, we agree that the document should clarify the difference in the level, scope, and type of analysis conducted under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act. Further, the document should explicitly state that Section 106 review and consultation will be conducted for individual undertakings as they are defined, following the parameters of the Plan.	Thank you for your comments. As SHPO has indicated, the comments submitted closely mimic those submitted by the National Park Service. Therefore, please refer to National Park Service comments 13 to 22 for Army responses.