

**Appendix L**  
**Agency and Government Correspondence**

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## APPENDIX L AGENCY AND GOVERNMENT CORRESPONDENCE

### L.1 COOPERATING AGENCY CORRESPONDENCE



DEPARTMENT OF THE AIR FORCE  
WASHINGTON DC

OFFICE OF THE ASSISTANT SECRETARY

FEB 16 2011

SAF/IEI  
1665 Air Force Pentagon  
Washington, DC 20330-1665

Ms. Elizabeth L. Ray  
Director, Airspace Services  
Mission Support Services  
Federal Aviation Administration  
800 Independence Ave., SW, Suite 400 East  
Washington, DC 20591

Dear Ms. Ray:


The Air Force and the Army jointly request your formal participation in the preparation of an Environmental Impact Statement (EIS) for the Joint Pacific Alaska Range Complex (JPARC) as prescribed in the President's Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) Regulations, 40 CFR § 1501.6 *Cooperating Agencies*.

As the lead agencies for the JPARC EIS, the Air Force and the Army request you participate in various portions of the EIS development as may be required. Specifically the Air Force and the Army ask for your support as a Cooperating Agency by:

- a. Participating in the scoping process
- b. Assuming responsibility, upon request by the Army and Air Force, for developing information and preparing analyses on issues for which you have special expertise
- c. Making staff available for interdisciplinary reviews

To avoid unnecessary delays in the NEPA process, the Air Force and the Army will provide appropriate information and related materials in a timely fashion to enable your agency to complete its review and respond promptly. Should you or your staff have any questions regarding this letter, our point of contact is Mr. Jamie Spell, Alaskan Command, Staff Engineer, (907) 552-1695.

Sincerely,

  
KATHLEEN L. FERGUSON, P.E.  
Deputy Assistant Secretary of the Air Force  
(Installations)

cc:  
SAF/IEE  
SAF/GCN  
HQ USAF/A7C  
HQ USAF/A3O  
HQ PACAF/A7PI  
ALCOM/J42



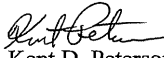
## Federal Aviation Administration

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### Memorandum

Date: March 4, 2011

To: John Warner, Group Manager, Operations Support Group, AJV-W

From:   
Kent D. Peterson, Alaska District Manager, TWA-A11

Subject: JPARC Response for the Anchorage Terminal Airspace

---

After completing an initial review of the Joint Pacific Alaska Range Complex Proposal, the Alaska District has determined there are four concerns within the Fairbanks Terminal Airspace and one concern within the Anchorage Terminal Airspace.

#### **Fairbanks**

##### Proposal 2: Realistic Live Ordinance Delivery

Alternative A, B and C will have an impact on the ability of Fairbanks ATCT and Anchorage ARTCC controllers to use the Charlie arrival and departure gate. Of the three, proposal A may allow use of this gate but would require review of the procedures to ensure that aircraft do not encroach on the proposed expansion of R-2202 B, C, and D. Proposals B and C would eliminate the use of this gate during active times of R-2202/R-2211.

##### Proposal 3: Joint Combined Arms Live Fire (JCALF)

The expansion of the Yukon Training Area would release airspace north of Eielson AFB, clockwise to the southeast of Eielson. This would be an expansion of R-2205 and would have an impact on departures at Eielson. Current procedures would not be separated from the proposed area. Reroutes of Eielson traffic to avoid this area would impact a significant part of VFR/IFR traffic working in and around the Fairbanks, North Pole and Ladd Army Airfield.

##### Proposal 4: Night Joint Training

Currently, Anchorage ARTCC controls the Fairbanks Airspace between 2300L and 0600L, daily. In the event the night joint training was approved, an evaluation of which air traffic facility (Fairbanks Airport Traffic Control Tower or Anchorage Air Route Traffic Control Center) could provide the best service would need to be accomplished.

Proposal 5: Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicle (UAV) Access

All of the corridors require separation from these areas and would require further mapping so controllers can ensure separation is maintained. Corridor A, C and F are proposed to be eight nautical miles wide from 3000 feet AGL to 17,999 MSL. These would restrict the ability to use T-232, V-444 and J-502/J-515. Additionally, corridor A is in an area of very high VFR/IFR training area for the Fairbanks ATCT airspace. This would impact the ability and options for controllers when conducting these operations. Corridor B is proposed to be five nautical miles wide from 1000 feet AGL to 5000 feet AGL. This would impact arrivals and departures at both Ladd Army Airfield and Eielson Air Force Base. Chena Beacon is the missed approach fix for Fairbanks and would be impacted by the implementation of this corridor. Corridors A and B would impact IFR operations in and out of the Fairbanks airspace as well as Ladd Army Airfield. All of these corridors effectively establish a wall that restricts non-participating aircraft from operating during times of activation. Depending on the separation requirement, the protected airspace may result in a much larger impact than described.

Corridor D would restrict the use of Charlie departure and arrival gate between Fairbanks ATCT and Anchorage ARTCC.

Although corridor G is well outside of Fairbanks ATCT airspace, it may impact the ability of aircraft to use T-232 and V-444.

**Anchorage**Proposal 1: Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA

The close proximity of the proposed Fox 5 and 6 Military Operating Areas (MOA) to Anchorage Terminal Radar Approach Control's (A11) airspace will require new or modified transfer procedures between Anchorage ARTCC (ZAN) and A11. Being only 10.5NM north of A11's airspace, the proposed airspace may lead to some impact or changes for the military flyers in regards to recovery routes, airspace delays, and/or entry and exit fix modifications.

A further analysis will be required to determine the exact impacts of the JPARC Proposal. If you have any questions, please contact myself at 907-271-2701, Don Schrader (Fairbanks) 907-474-0050, or David Chilson (Anchorage) at 271-2710.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

MAR 10 2011

Kathleen I. Ferguson, P.E.  
Deputy Assistant Secretary of the Air Force (Installations)  
SAF/IEI  
1665 Air Force Pentagon  
Washington, DC 20330-1665

Dear Ms. Ferguson:

Thank you for your letter requesting the Federal Aviation Administration participate as a cooperating agency in the environmental impact statement (EIS) for the proposed Joint Pacific Alaska Range Complex (JPARC).

The FAA is pleased to participate in the EIS process in accordance with the National Environmental Policy Act of 1969 as amended, and its implementing regulations. Since the proposal involves special use airspace (SUA), the FAA will cooperate following the guidelines described in the Memorandum of Understanding between the FAA and the Department of Defense Concerning SUA Environmental Actions, dated October 4, 2005.

Modification of the SUA resides under the jurisdiction of the Western Service Center, Operations Support Group, Renton, WA. The Western Service Center will be the primary focal point for matters related to both airspace and environmental matters. Mr. John Warner is the Manager of the Operations Support Group. FAA Order 7400.2, Chapter 32 indicates the airspace and environmental processes should be conducted in tandem as much as possible; however, they are separate processes. Approval of either the aeronautical process or the environmental process does not automatically indicate approval of the entire proposal. I have enclosed Appendix 2, 3, and 4 of FAA Order 7400.2 for additional details.

A copy of the incoming correspondence and this response is being forwarded to Mr. Warner of the Western Service Center, Operations Support Group. Mr. Warner can be contacted at (425) 203-4500 for further processing of your proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis E. Roberts".

Dennis E. Roberts  
Director, Airspace Services  
Air Traffic Organization

3 Enclosures

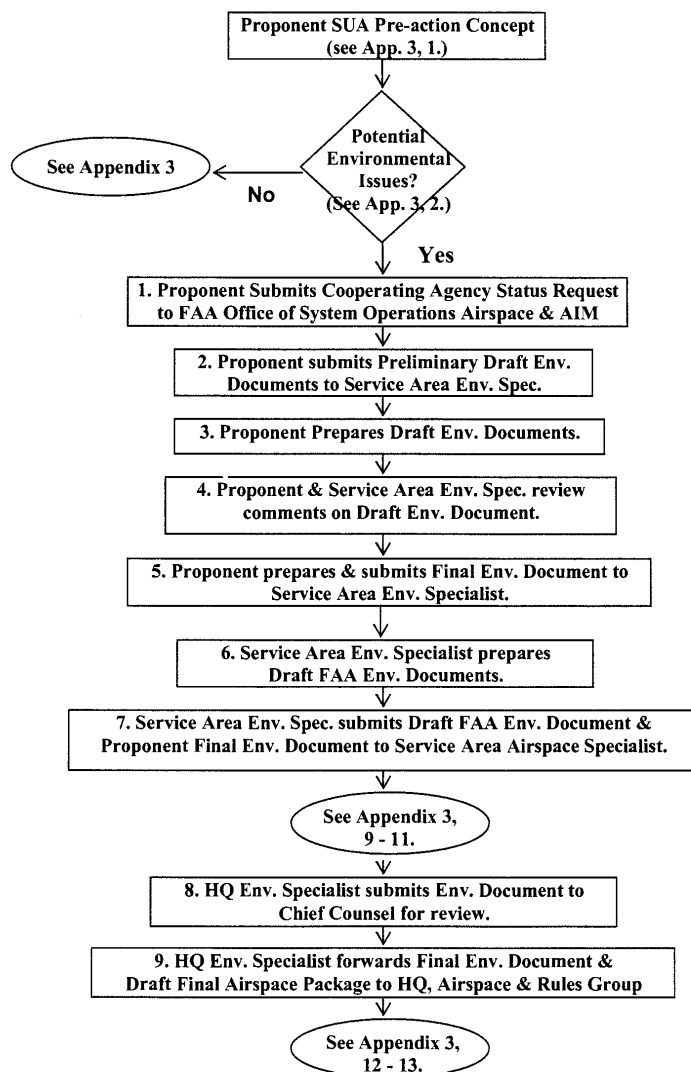


4/10/08

JO 7400.2G

## Appendix 2. Procedures For Processing SUA Actions Environmental Process Flow Chart

(This Chart is for use with Appendix 4 and the numbers correlate to the numbers in the Environmental column of that table.)



Procedures for Processing SUA Actions Environmental Process Flow Chart

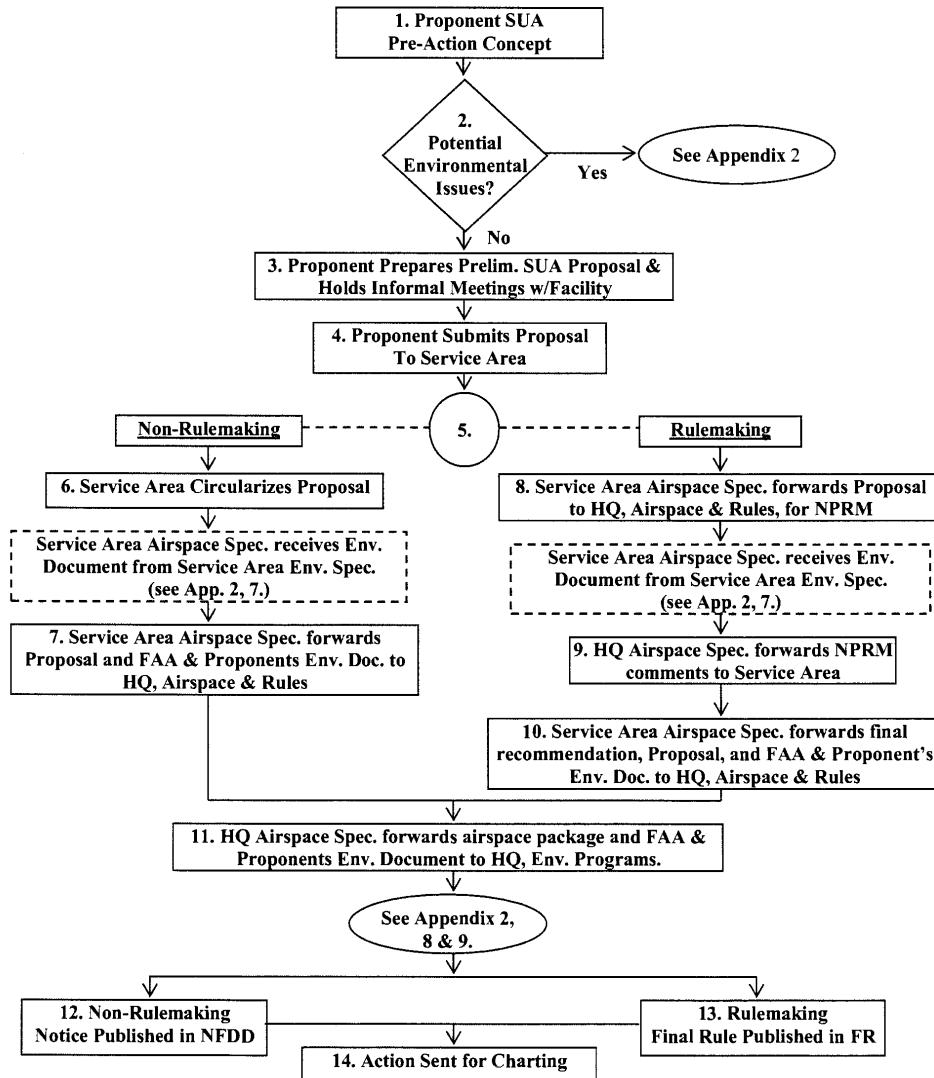
Appendix 2-1

4/10/08

JO 7400.2G

### Appendix 3. Procedures For Processing SUA Actions Aeronautical Process Flow Chart

(This Appendix is for use with Appendix 4 and the numbers correlate to the numbers in the Aeronautical column of that table.)



Procedures for Processing SUA Actions Aeronautical Process Flow Chart

Appendix 3-1

4/10/08

JO 7400.2G

### Appendix 4. FAA Procedures for Processing SUA Actions Aeronautical and Environmental Summary Table

(The aeronautical and environmental processes may not always occur in parallel.)

(This Appendix is for use with Appendix 2 and Appendix 3, and the numbers correlate to numbers on those charts.)

(See note below.)

AERONAUTICAL	ENVIRONMENTAL
1. Proponent shall present to the Facility a Pre-draft concept (i.e., new/ revisions to SUA needed or required).	1. Proponent shall discuss with the Service Area, at the earliest time, the potential for environmental impacts associated with the proposal.
	2. If there is the potential for environmental impacts, Proponent shall make a request to the FAA for a Cooperating Agency (CA) status when Proponent decides to initiate the environmental process. Proponent shall forward the request to the Director of the System Operations Airspace and AIM. The Director will transmit the request to the Environmental Programs Group who prepares and forwards the response to Proponent. The Environmental Programs Group will send a courtesy copy of the response to the responsible Service Area. The Service Area environmental specialist works as the FAA point of contact throughout the process in development of any required environmental documentation.
	3. Proponent submits a Preliminary Draft EA or EIS to the Service Area environmental specialist.  The Service Area environmental specialist shall provide comments, in consultation with the airspace specialist and the Environmental Programs Group, back to Proponent.

FAA Procedures for Processing SUA Actions Aeronautical and Environmental Summary Table

Appendix 4-1

JO 7400.2G

4/10/08

2. Proponent forwards the aeronautical proposal to the FAA Service Area for review and processing by the airspace specialist.	4. Proponent prepares a Draft EA or EIS with a 45-day public comment period. As the FAA CA point of contact, the Service Area environmental specialist reviews the associated draft environmental documentation to ensure that the Proponent addressed adequately all environmental concerns submitted on the Preliminary Draft. If required, the Service Area environmental specialist forwards the draft environmental documentation to the Environmental Programs Group for review and comment by the headquarters environmental specialist and the Office of Chief Counsel.
3. The Service Area airspace specialist, in accordance with this order, determines the type of airspace action(s) necessary, either Non-Rulemaking or Rulemaking. FAA Service Area and Proponent determine if informal Airspace Meetings are required.	
<b>For Non-Rulemaking:</b>	
4. The Service Area airspace specialist sends out a circularization with a 45-day public comment period. The Service Area airspace specialist reviews and prepares, in consultation with the Proponent, responses to the aeronautical comments from the study and circularization in accordance with Chapter 21 of this order.	5. The Proponent reviews comments received on their Draft EA/FONSI or EIS and prepares their responses to the comments, in consultation with the FAA and other cooperating agencies, if necessary, and in accordance with Chapter 32 of this order.
	6. Proponent prepares and submits their Final EA/FONSI or EIS/ROD to the Service Area environmental specialist.
	7. The Service Area environmental specialist prepares a Draft FAA FONSI/ROD or Draft FAA Adoption Document/ROD.
	8. The Service Area environmental specialist submits the Draft FAA FONSI/ROD or Draft FAA Adoption Document/ROD and the Proponent's Final EA/FONSI or EIS/ROD to the Service Area airspace specialist for inclusion with the airspace proposal package.
5. The Service Area airspace specialist then sends the completed package containing the aeronautical proposal, response to comments, Proponent's Final EA/FONSI, and the Draft FAA FONSI/ROD to the Headquarters Airspace and Rules Group with their recommendation.	

Appendix 4-2

FAA Procedures for Processing SUA Actions Aeronautical and Environmental Summary Table

4/10/08

JO 7400.2G

<b>For Rulemaking:</b>	
6. The Service Area airspace specialist sends the proposal to the Airspace and Rules Group who prepares a Notice of Proposed Rulemaking (NPRM). The Headquarters Airspace and Rules Group submits the NPRM for publication in the Federal Register with a 45-day comment period in accordance with Chapter 2 of this order.	
7. The Headquarters airspace specialist sends comments received on the NPRM to the Service Area airspace specialist for resolution.	
8. The Service Area airspace specialist then sends the completed package containing the response to comments, final service area recommendation, the proposal, Proponent's Final EA/FONSI or EIS/ROD, and the Draft FAA FONSI/ROD or Draft FAA Adoption Document/ROD to the Headquarters Airspace and Rules Group for preparation of the Final Rule.	
9. The Headquarters airspace specialist forwards the draft final rule package or draft non-rulemaking case summary (NRCS) with all supporting documentation to the Headquarters Environmental Programs Group for review (after all aeronautical comments have been resolved).	9. The Headquarters environmental specialist reviews the package for environmental technical accuracy; then submits the environmental documentation to the Office of the Chief Counsel, Airports and Environmental Law Division, for legal sufficiency review (having collaborated throughout the process).
	10. The Chief Counsel's environmental attorney's comments are incorporated into the final FAA environmental decision and signed by Headquarters Environmental Programs Group Manager.  The package is then returned to the Headquarters Airspace and Rules Group.
10. For Non-rulemaking: The non-rulemaking action is published in the National Flight Data Digest.	
11. For Rulemaking: The Final Rule is published in the Federal Register. The Final Rule will contain a reference to the decision rendered and location of documentation for the associated environmental process.	

JO 7400.2G

4/10/08

Consult the following documents throughout the process for further information:

- Council on Environmental Quality Regulations for Implementing the National Environmental Policy Act (NEPA), 40 CFR Parts 1500-1508
- FAA Order 1050.1E, "Environmental Impacts: Policies and Procedures"
- FAA Order 7400.2, "Procedures for Handling Airspace Matters," Part 5
- FAA Order 7400.2, Chapter 32, "Environmental Matters" and the associated appendixes (for specific SUA environmental direction)

**NOTE:** The time periods below are for a non-controversial aeronautical proposal and its associated environmental process. The time periods are for FAA review/processing only. Times for proponent and/or environmental contract support processing must be added.

**ENVIRONMENTAL:** The estimated time of completion for EA processing is 12 to 18 months or, for EIS processing, 18 to 36 months.

**AERONAUTICAL (Non-Rulemaking):** A minimum 4 months is required from submission of the Formal Airspace Proposal by the Proponent to the Service Area through completion of the circularization process. Additionally, a minimum of 6 months is required from submission of the Formal Airspace Proposal by the Service Area to Headquarters through completion of the charting process.

**AERONAUTICAL (Rulemaking):** A minimum 6 weeks for Service Area processing, and a minimum of 9 months to complete rulemaking once the formal package is received at Headquarters.



## Federal Aviation Administration

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### Memorandum

Date: MAR 11 2011

To: Lori Andriesen, Program Manager, AJV-W21

From: *Bob W.*  
Bob Watkins, Air Traffic Manager, Anchorage ARTCC

Subject: Comments for the future Joint Pacific Alaska Range Complex (JPARC) Expansion

---

Attached are comments for the proposed JPARC Environmental Impact Statement (EIS).

If you have any questions regarding this information, please contact Mark Edge, Military Operations Specialist, ZAN-530.ME at (907) 269-1121.

**ANCHORAGE ARTCC (ZAN)  
INITIAL COMMENTS FOR THE  
JOINT PACIFIC ALASKA RANGE COMPLEX (JPARC) PROPOSED  
ENVIRONMENTAL IMPACT STATEMENT**

The following are initial comments for the future JPARC EXPANSION EIS based on the information provided to Anchorage ARTCC and in accordance with FAA JO7400.2, paragraph 21-4-3.

**1. Proposed Fox 3 Military Operating Area (MOA) Expansion and New Paxon MOA:**

- a. Fox 3 MOA: No comment at this time.
- b. Fox 4 MOA: No comment at this time.
- c. Fox 5 and 6 MOA: The lateral boundaries of Fox 5/6 MOAs extend too far south and west, therefore, do not allow the following:
  - (1) Sequencing of northbound Anchorage departures en route to the Fairbanks area. Typically, northbound traffic requires sequencing to the east of V438 and J115. The sequencing to the west of these airways would be inadvisable and also be a possible safety risk as all aircraft southbound to the Anchorage Terminal Area are sequenced between Talkeetna, Alaska and Anchorage, Alaska.
  - (2) Sequencing of arrivals and departures between the Anchorage Airport and Gulkana, Alaska. With the current Fox 5 MOA information given to ZAN and the boundaries of Anchorage TRACON, there is very little room for vectoring aircraft left or right of course.
- d. Paxon MOA: With the information provided, the establishment of a Paxon MOA would close 3 low altitude airways (V481, V515, and V444). The outcome of closing these airways would be as follows:
  - (1) Small or low flying aircraft would be forced to either proceed from Gulkana/Northway, Alaska to Delta Junction/Fairbanks, Alaska VFR. As most of this airspace is requested in conjunction with adjacent pieces of airspace, circumnavigation of the airspace is unlikely. Terrain in this area is very high and could preclude a small aircraft from flying around this airspace VFR.
  - (2) The lack of low altitude radar and frequency coverage may eliminate the ability for small or low flying aircraft to proceed to the previously stated airports on anything other than established airways.



**2. Proposed Realistic Live Ordinance Delivery:**

No comment at this time.

**3. Proposed Joint Combined Arms Live Fire:**

With the information provided, the establishment of the BAX Restricted Area would close 3 low altitude airways (V481, V515, and V444). The outcome of closing these airways would be the same as previously stated under the Paxon MOA.

**4. Proposed Night Joint Training:**

No comment at this time.

**5. Proposed Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicle (UAV)**

**Access:**

No comment at this time.

**6. Proposed Enhanced Access to Ground Maneuver Space:**

No comment at this time.

**7. Proposed Joint Air – Ground Integration Complex:**

No comment at this time.

**8. Proposed Intermediate Staging Bases:**

No comment at this time.

**9. Proposed Missile Live Fire for AIM – 9X and AIM – 120 in the Gulf of Alaska:**

No comment at this time.

**10. Proposed Joint Precision Airdrop System Drop Zones:**

No comment at this time.

## **L.2 GOVERNMENT-TO-GOVERNMENT CONSULTATION**

### **L.2.1 Government-to-Government Consultation Follow-up Letter and Minutes**



HEADQUARTERS ALASKAN COMMAND (ALCOM)  
JOINT BASE ELMENDORF-RICHARDSON ALASKA

APR 8 2011

Lieutenant General Dana T. Atkins  
Commander, Alaskan Command  
9480 Pease Avenue, Suite 110  
JBER AK 99506

Mr. Eric Olsen  
Council Member, Sun'aq Tribe of Kodiak  
312 West Marine Way  
Kodiak, AK 99615

Dear Mr. Olsen

Thank you for joining me and Brigadier General Palumbo on 28 February 2011 for formal government-to-government consultation regarding our proposed enhancements to the Joint Pacific Alaska Range Complex (JPARC). We were honored by the respect and integrity you and the other tribal leaders exhibited during your visit. We hope you gained a better understanding of our proposals. We have enclosed minutes to accurately reflect our discussion and agreements. We have a much better understanding of your concerns now and are pleased we came to some agreements to address them. I always learn so much whenever I meet with tribal leaders and appreciate your participation.

If you require any other information on JPARC or the consultation, please contact my Native Affairs and Natural Resources Advisor, Dr. Jerome Montague at (907) 552-2769 or [jerome.montague@elmendorf.af.mil](mailto:jerome.montague@elmendorf.af.mil). You can also track JPARC developments and find more detailed information on our website [www.jparceis.com](http://www.jparceis.com).

Sincerely

*Dana T. Atkins*  
DANA T. ATKINS  
Lieutenant General, USAF  
Commander

Enclosure: Minutes of Consultation

cc: MG Palumbo

*Guardian of the North*



HEADQUARTERS ALASKAN COMMAND (ALCOM)  
JOINT BASE ELMENDORF-RICHARDSON ALASKA

APR 8 2011

Lieutenant General Dana T. Atkins  
Commander, Alaskan Command  
9480 Pease Avenue, Suite 110  
JBER AK 99506

Mr. William Miller  
President, Dot Lake Tribal Council  
P.O. Box 2279  
Dot Lake AK 99737

Dear Mr. Miller

Thank you for joining me and Brigadier General Palumbo on 28 February 2011 for formal government-to-government consultation regarding our proposed enhancements to the Joint Pacific Alaska Range Complex (JPARC). We were honored by the respect and integrity you and the other tribal leaders exhibited during your visit. We hope you gained a better understanding of our proposals. We have enclosed minutes to accurately reflect our discussion and agreements. We have a much better understanding of your concerns now and are pleased we came to some agreements to address them. I always learn so much whenever I meet with tribal leaders and appreciate your participation.

If you require any other information on JPARC or the consultation, please contact my Native Affairs and Natural Resources Advisor, Dr. Jerome Montague at (907) 552-2769 or [jerome.montague@elmendorf.af.mil](mailto:jerome.montague@elmendorf.af.mil). You can also track JPARC developments and find more detailed information on our website [www.jparceis.com](http://www.jparceis.com).

Sincerely

A handwritten signature in black ink, reading "Dana T. Atkins", is positioned above the typed name.

DANA T. ATKINS  
Lieutenant General, USAF  
Commander

Enclosure: Minutes of Consultation

cc: MG Palumbo

*Guardian of the North*



HEADQUARTERS ALASKAN COMMAND (ALCOM)  
JOINT BASE ELMENDORF-RICHARDSON ALASKA

APR 8 2011

Lieutenant General Dana T. Atkins  
Commander, Alaskan Command  
9480 Pease Avenue, Suite 110  
JBER AK 99506

Mr. Doug Wade, Chairman  
Chickaloon Village  
P.O. Box 1105  
Chickaloon AK 99674

Dear Mr. Wade

Thank you for joining me and Brigadier General Palumbo on 28 February 2011 for formal government-to-government consultation regarding our proposed enhancements to the Joint Pacific Alaska Range Complex (JPARC). We were honored by the respect and integrity you and the other tribal leaders exhibited during your visit. We hope you gained a better understanding of our proposals. We have enclosed minutes to accurately reflect our discussion and agreements. We have a much better understanding of your concerns now and are pleased we came to some agreements to address them. I always learn so much whenever I meet with tribal leaders and appreciate your participation.

If you require any other information on JPARC or the consultation, please contact my Native Affairs and Natural Resources Advisor, Dr. Jerome Montague at (907) 552-2769 or [Jerome.Montague@elmendorf.af.mil](mailto:Jerome.Montague@elmendorf.af.mil). You can also track JPARC developments and find more detailed information on our website [www.jpargcis.com](http://www.jpargcis.com).

Sincerely

A handwritten signature in black ink that reads "Dana T. Atkins".

DANA T. ATKINS  
Lieutenant General, USAF  
Commander

Enclosure: Minutes of Consultation

cc: MG Palumbo

*Guardian of the North*



HEADQUARTERS ALASKAN COMMAND (ALCOM)  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

Minutes of Government-to-Government Consultation Between Alaskan  
Command and Chickaloon Village, Dot Lake Tribal Council and Sun'ag  
Tribe of Kodiak Concerning Proposed Enhancements to Joint Pacific  
Alaska Range Complex, 28 February 2011, Joint Base Elmendorf-  
Richardson, Alaska

Agenda

- |          |   |
|----------|---|
| 10:00 AM | Tour of Joint Operations Center (Mr. Jurewicz)  |
| 10:30    | Tour of F-22, AIM-9 and AIM-120 missiles display (Lt Col Davis)   |
| 11:30    | Tour of 212 <sup>th</sup> Rescue Squadron (SMSgt Nelson)  |
| 12:30PM  | Welcome and introductions (Lt Gen Atkins) (working lunch at Arctic Warrior<br>Event Center-Billy Mitchell room) |
| 12:40    | Prayer (Mr. Olsen)  |
| 12:45    | Command Video   |
| 1:25     | Summary of the agency's consultation policy outlining rights and responsibilities<br>(Dr. Montague)             |
| 1:45     | Break   |
| 1:55     | Summary of proposed missile firing in Gulf of Alaska (Maj Cabral)   |
| 2:15     | Summary of activities in proposed Paxon Military Operating Area (MOA)<br>(Maj Cabral)                           |
| 2:35     | Summary of activities in proposed Fox 5 MOA (Maj Cabral)  |
| 2:55     | Break   |
| 3:00     | Consultation (Lt Gen Atkins, Mr. Miller, Mr Olsen, BG Palumbo, and<br>Mr. Wade)                                 |
| 4:00     | Adjourn   |

*Guardian of the North*

#### Attendees

Mr. Gene Agnew, Chickaloon Village, Transportation Department  
Lt Gen Dana Atkins, Commander, Alaskan Command (ALCOM)  
COL Thomas Bell, Deputy Director, Joint Exercise and Training Directorate, ALCOM  
Maj Michael Cabral, Chief, Joint Exercise Division, ALCOM  
Mr. Jeff Fee, Director, Joint Exercise and Training Directorate, ALCOM  
Mr. William Miller, President, Dot Lake Tribal Council  
Dr. Jerome Montague, Native Affairs and Natural Resources Advisor, ALCOM  
Mr. Eric Olsen, Council Member, Sun'aq Tribe of Kodiak  
BG (P) Raymond Palumbo, Deputy Commander, ALCOM  
MAJ Russell Price, Deputy Director, Logistics and Engineering, ALCOM  
Mr. Rickhart Rowland, Natural Resources Director, Sun'aq Tribe of Kodiak  
Ms. Joan Smart, Community Relations Specialist, ALCOM  
Mr. Doug Wade, Chairman, Chickaloon Village

#### Discussion

**Dot Lake:** Dot Lake indicated there has been supersonic low-level over flights even within the 4000' AGL restricted area around his village. The most disturbing over flights are low level, fast and/or with sonic booms. Low and slow is not really too bothersome. In the past Army personnel caused the most trouble. Once off-duty officers landed a helicopter on a lake near the tribe to go ice fishing. Their main concerns are not disturbing the non-migrating caribou during the calving season on the Macomb Plateau and not disturbing the moose during the two-week hunting season in the fall. The tribe indicated they were grateful for ALCOM's distinct recognition of tribal sovereignty and the opportunity to consult one-on-one with the commanders. In previous consultation with the military, tribal members suggested that the DoD will only listen to their concerns and not do anything about them. Their experience after consultation over military training routes in 2004 was the Air Force really did re-route MTRs away from their village.

ALCOM replied that non-Alaskan pilots are sometimes less familiar with the airspace and make mistakes. If we find out about it, we retrain the pilots to ensure future compliance with the rules. Now our planes have displays which show exactly where they are. Further, air traffic controllers are also now helping pilots stay within their bounds. Using military planes for recreation is a violation of federal law.

**Chickaloon:** Chickaloon asked how our radio frequency jamming exercises affect civilian use. The tribe discussed how there were many violations of game laws by Service members many years ago such as shooting caribou and moose with non-expanding full metal jacket bullets that do not kill cleanly. These occurrences still leave a bad taste in their mouth and even recently some Soldiers shot two swans and other animals out of season. The tribe asked the military to oppose development near them. Their main environmental concerns were protection of Dall sheep lambing and caribou calving areas near them from disturbance by aircraft. The tribe indicated some other tribes did not consult but had concerns.

ALCOM indicated the Air Force cannot jam or interfere with civilian frequencies. Service members committing crimes outside military areas may be prosecuted by civilian or military

authorities. The military is the benchmark in the nation for race relations and controlling drug abuse. The military now has no conscripts and is better educated, with over one quarter of enlisted members having bachelor's degrees. This is a very different atmosphere than you might have experienced in the '60s and '70s. A few of the tribes who were offered to consult for JPARC did not wish to consult but none-the-less had some concerns. These concerns are attached and will be considered in any final proposal.

**Sun'aq:** Sun'aq had many concerns over training activities in the Gulf of Alaska (GOA) both with the Navy's GOA Environmental Impact Statement (EIS) and what was proposed with the JPARC EIS. Their concerns centered around effects of military training (from explosions, sonar and contaminants) on salmon and marine mammals while at sea before they get near their subsistence areas. They further indicated salmon are badly disturbed even from the shadow of aircraft flying over. They wondered if the training area could be moved further offshore or moved from place to place. How do you protect marine life from non-exploding missiles? They outlined how the Kodiak missile launch facility was initially sold to the public for one use but has now expanded into many different uses than was originally proposed. Will you do this with JPARC? Also will you use local knowledge when developing and implementing your proposal? This tribe also indicated they were grateful for ALCOM's distinct recognition of tribal sovereignty and the opportunity to consult one-on-one with the commanders.

ALCOM reminded all that this consultation was only for Air Force activities in the GOA (100 non-exploding air-to-air missile firings annually) and that the consultation and public comment period was over on the Navy's proposed activities in the GOA (these began in 2007). Our missiles are non-exploding and the rocket motors burn out in 17 seconds, usually before impact with the water. Therefore, the amount of contaminants resulting is miniscule. Further, most air-to-air missiles are fired mid-altitude (20,000 feet). No aircraft will be casting a dark shadow on marine life. The over water training areas cannot be moved further offshore due to the fact that these areas must be near enough to bases so that fuel costs would not be prohibitive. The training areas cannot be moved around because an EIS needs to be prepared for every training area and that is cost prohibitive. ALCOM understood the "bait and switch" concern expressed during the comparison with the Kodiak Launch facility. This was not a directly applicable comparison since the launch facility was a private enterprise and JPARC was the Department of Defense (DoD). Nonetheless, the tribes would be protected from this in that any new proposal would require new government-to-government consultation and a new EIS. Lastly, ALCOM indicated it would be foolish to not use and benefit from the local knowledge.

### Consultation Agreements

ALCOM:

Agreed to extend existing flight restrictions along the Alaska Highway further east on the highway near the north boundary of the proposed Paxon MOA.

Agreed to develop flight restrictions during the caribou calving season over the Macomb Plateau.

Agreed to consider some flight restrictions during the 2-week fall moose hunting season.

Agreed to provide Chickaloon Village with the decibel level of a supersonic F-22 at 5000' AGL.

Agreed to consider some flight restrictions during caribou calving and Dall sheep lambing periods near Chickaloon.

Agreed to allow the three tribes to contact COMALCOM directly if the tribe felt it necessary.

Agreed to allow the three tribes to re-initiate consultation if, after JPARC enhancement is implemented, the tribe(s) observe negative effects on wildlife.

Chickaloon:

Agreed that while they were opposed to any development near them, the JPARC enhancements seemed minimally invasive and in progress they will not fight pending evaluation after it is implemented.

Dot Lake:

Agreed the proposed flight restrictions addressed their concerns.

Sun'aq:

Agreed that although the tribal council opposed this proposal, after what was learned during the consultation, they have no concerns with the JPARC proposal but continue to have reservations about Navy activities.

**The Tribe With Concerns But Did Not Seek Government-to-Government  
Consultation with Alaskan Command Concerning Proposed JPARC  
Enhancements:**

Cheesh-na Tribal Council: This tribe indicated the proposed area was not close enough to them to cause direct concerns but they would like us to consider avoiding low-level flights over swan nesting areas and avoiding low-level flights over waterfowl concentrations anywhere. There are 1-3 jet flights up the Copper River each year, and they do not like it. They also do not like the Nabesna Road.



## L.2.2 Initial Alaska Native Government-to-Government Consultation Letter with Enclosure and Mailing List

### ALASKA NATIVE GOVERNMENT-TO-GOVERNMENT CONSULTATION LETTER WITH ENCLOSURE AND MAILING LIST



HEADQUARTERS  
ALASKAN COMMAND (ALCOM)  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

Lieutenant General Dana T. Atkins  
Commander, Alaskan Command  
9480 Pease Ave., Suite 110  
JBER AK 99506-2101

Ms. Veronica Nicholas, President  
(or current President)  
Native Village of Cantwell  
P.O. Box 94  
Cantwell AK 99729

Dear Ms. Nicholas

The Department of Defense is proposing to reconfigure existing Alaska military airspace and training land to meet current and future training requirements. This reconfiguration, named Joint Pacific Alaska Range Complex (JPARC), will create a world class air, land, sea and computer simulated joint military training range. New, advanced, technologies, smarter opponents and tougher warfare terrain have brought about dramatic change in our training needs. JPARC would provide active-duty, National Guard and reserve components of the Army, Navy, Marine Corps, Air Force, Coast Guard and Special Operations military units the opportunity to train together (enclosure 1). Joint, realistic combat training is essential to the success of today's military operations and requires a location to accommodate air, ground, space, and maritime training operations. Currently the Army, Navy and Air Force base and train their units at Alaska installations, taking advantage of existing live-fire training ranges, special use airspace, restricted airspace, transit corridors and maritime environments. JPARC would combine the capabilities of these existing installations into a single training complex unmatched in the world.

Pursuant to our American Indian/Alaska Native Policy and Implementation Guidance (enclosure 2), I ask you to consider whether this proposal may have the potential to significantly affect any of the Cantwell Tribe's tribal rights, Indian land or protected tribal resources. Since this proposal is complex we have scheduled 60 days for your review hence I would appreciate a reply by November 8, 2010, with your

analysis. If you think your tribe will be affected, please specify which tribal right(s) or protected tribal resource(s) will be affected and how it (they) will be significantly affected. If you reply by indicating an effect to a right, resource or Indian land, we invite you to consult with us on a Government-to-Government basis as a way to discuss issues before we move forward with further environmental analysis and public comment. Additional information on this project can be found by visiting [www.jparceis.com](http://www.jparceis.com). We look forward to working with you to address any concerns you have on this project. Also, please let us know if you think tribes other than those listed in enclosure 3 may have concerns with JPARC. Please contact my Native Affairs Advisor, Dr. Jerome Montague, at [Jerome.montague@elmendorf.af.mil](mailto:Jerome.montague@elmendorf.af.mil) or (907) 552-2769 if you have any questions.

Sincerely

DANA T. ATKINS  
Lieutenant General, USAF  
Commander

3 Enclosures:

1. JPARC Proposed Activities and Maps
2. DoD American Indian/ Alaska Native Policy and Alaska Implementation Guidance
3. JPARC Tribal Consultation Address list

**PURPOSE AND NEED FOR THE PROPOSED  
JOINT PACIFIC ALASKA RANGE COMPLEX ENVIRONMENTAL IMPACT STATEMENT  
ACTIONS**

The U.S. Department of Defense (DoD) faces an exceptional challenge to meet compelling and increasingly urgent warfighter needs. In an era of persistent combat operations, the DoD continues to generate new technologies, learn from battlefield experiences, update tactics, and train intensively. Each of these challenges drives the need for continued development and enhancements to the range and airspace infrastructure to more accurately replicate the modern battlefield for training and testing. With the planned continued development and enhancements, the Joint Pacific Alaska Range Complex (JPARC) would provide the critical future training and testing required in a manner that maximizes modern battlespace realism.

**1.1 Background to the JPARC**

Studies by the U.S. Joint Forces Command and others predict that U.S. military combat operations will require response to a blend of conventional and irregular threats from peer or near-peer potential adversaries. Adding to the challenge, the physical conditions in the regions of potential conflict are characterized by harsh climates. Joint forces and joint training are key strategy elements in responding to these threats.

Currently, Alaska's military assets use extensive air, land, and sea areas to replicate realistic conditions for relevant combat training and testing of combat systems. However, expanded weapons and sensor capabilities, expanded mobility, and improved communications have all driven the need for larger operational footprints. Ranges and airspace used for training must respond as technology continues to expand the military footprint, and as combat operations continue as complex, full-spectrum, blended engagements that call for agile joint forces to deploy into complex terrain.

Our forces must always be ready to operate immediately as a joint team in all domains—land, sea, air, maritime, and information. The JPARC would provide a training venue with the land, water, and airspace for joint Services home training. Alaska provides a unique backdrop with an uncluttered electromagnetic environment, minimal encroachment, and a strategic location within the sovereign bounds of the United States.

The expanse and availability of the ranges and airspace would allow commanders to train for full-spectrum engagements from individual skills up to tactical and operational joint tasks. The vision for the JPARC builds on these inherent strengths and drives continued tactical relevance to the evolving operational conditions, latest technology, and mission priorities that require joint training approaches.

Developing the JPARC would build on a firm foundation of extensive training, decades of testing, and range infrastructure already in place. Future investments would come from the individual Services—Army, Air Force, and Navy—that would jointly benefit from these capabilities. In recognition of the value of collaboration among JPARC Stakeholders, the U.S. Pacific Command (USPACOM) directed the creation of the Alaska Joint Training Program of Excellence, with the JPARC as its centerpiece.

**1.2 Proposed JPARC Actions and Alternatives**

The following projects are those currently proposed to be addressed in the *Joint Pacific Alaska Range Complex Environmental Impact Statement (JPARC EIS)*. The proposed JPARC would create improved training and testing opportunities through continued development and enhancement of Alaska's current training areas and capabilities. The military Services jointly propose to enhance and/or establish new Military Operations Areas, Restricted Areas, airspace corridors, ground maneuver training areas, training facilities and supporting infrastructure to provide adequate airspace and controlled-access land to train under realistic and varied conditions.

The *JPARC EIS* will analyze the environmental effects of the proposed JPARC continued development and enhancements, including special use airspace expansion, land-based training/maneuver space expansion, road and airfield construction, facility construction and renovation, equipment storage and operation, onsite maintenance, live ordnance delivery, training with remotely piloted aircraft, extended night vision training, buffered drop zones, and the use of training airspace. The descriptions of the proposed JPARC actions are presented in the table below, *JPARC EIS* Proposed Actions and Alternatives and in Attachment A, JPARC Overview of EIS Proposed Actions and Alternatives. Attachments B through H more specifically identify the locations for the *JPARC EIS* Proposed Actions and Alternatives.

<i>JPARC EIS</i> Proposed Actions and Alternatives	Map
<p><b>① Fox 3 Military Operating Area (MOA) Expansion and New Paxon MOA</b></p> <p><b>Proposed Action:</b> The Air Force proposes to expand the Fox 3 MOA and establish a new, adjacent Paxon MOA to provide the vertical and horizontal airspace structure needed to better accommodate low-altitude threat and multiple-axis mission activities during Joint Pacific Alaska Range Complex training exercises.</p> <p><b>Key Components:</b> Expand the boundaries of the existing Fox 3 MOA, currently extending from 5,000 feet above ground level (AGL) up to, but not including flight level (FL) 180, to the south and east and subdivide it into four sectors, with the newly expanded sectors extending from 500 feet AGL up to, but not including, FL180. Establish a new Paxon MOA, extending from 500 feet AGL up to, but not including, FL180, to adjoin the proposed expanded Fox 3 MOA to the east.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> includes the proposed expanded Fox 3 MOA and the proposed new Paxon MOA with both the high- and low-altitude MOAs.</p> <p><b>Alternative B</b> includes only the Fox 3 MOA expansion (as in Alternative A) without the new Paxon MOA.</p> <p><b>Alternative C</b> includes the Fox 3 MOA expansion without the low-altitude MOA.</p> <p><b>Alternative D</b> proposes keeping the Fox 3 MOA boundaries the same as they currently exist, but separating the MOA into four subdivided sectors, as well as high- and low-altitude MOAs. The low-altitude MOA would extend from 500 feet AGL up to, but not including 5,000 feet AGL. The high-altitude MOA elevations would match those currently existing.</p>	<p><b>Attachment B</b></p> <p><b>Proposed Fox MOA Expansion</b></p>

JPARC EIS Proposed Actions and Alternatives	Map
<p><b>Realistic Live Ordnance Delivery</b></p> <p><b>Proposed Action:</b> The proposed action is to establish a realistic air and ground training environment that would accommodate live ordnance delivery.</p> <p><b>Key Components:</b> As the technology for new weapons systems continues to evolve, the ground footprint for ordnance delivery training continues to expand, thus creating the need for larger ground and airspace areas in which to safely conduct this training. The GBU-32 [Guided Bomb Unit-32] and Small-Diameter Bomb (SDB) have the largest footprints; therefore, they would serve as the basis for locating the targets and the airspace needed to fully support live ordnance delivery using these systems. Live ordnance activities would be executed as part of both individual pilot training and joint training with other air and ground units.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> proposes the use of existing targets in the Oklahoma Impact Area within Restricted Airspace 2202 (R-2202) with the expansion of this restricted airspace to the west to encompass the airspace and underlying lands.</p> <p><b>Alternative B</b> proposes that live ordnance delivery make use of existing targets at the Oklahoma and Blair Lakes Impact Areas with new restricted airspace established that links R-2211 and R-2202. Based on the ceiling altitude of R-2211 as flight level (FL) 310 and the upper altitude of R-2202 being FL310, the proposed altitude for the restricted airspace linking these two restricted areas would also be FL310. Higher altitudes may be required for some live-fire ordnance profiles.</p> <p><b>Alternative C</b> proposes weapons corridors through the Eielson Military Operations Area and overlying Air Traffic Control Assigned Airspace that would provide two protective pathways for live ordnance use within the Oklahoma Impact Area. These corridors would be approximately 10 miles in width and extend from FL200 to FL310, as needed, to accommodate the delivery altitudes of the ordnance types being delivered.</p>	<p><b>Realistic Live Ordnance Delivery Alternatives</b></p> <p>Attachment C: Alternative A Proposed R-2202 Expansion</p> <p>Attachment D: Alternative B Proposed Restricted Area Linking R-2211 and R-2202</p> <p>Attachment E: Alternative C Proposed Eielson Weapons Corridors</p>
<p><b>Joint Combined Arms Live Fire (JCALF)</b></p> <p><b>Proposed Action:</b> The Army proposes to establish restricted airspace (RA) to better support JCALF training over the Battle Area Complex (BAX) located in the Donnelly Training Area (DTA) near Delta Junction, and the Digital Multipurpose Training Range (DMPTR), located in the Yukon Training Area (YTA).</p> <p><b>Key Components:</b> JCALF is a critical component to Army training because this exercise activity involves multiple combat functions operating together to accomplish the same mission objectives. For example, armed reconnaissance helicopters, such as OH-58Ds, and ground forces practice maneuvering together against the same objectives. In addition, Air Force A-10s could provide support during the JCALF training exercises. This type of joint training is a critical step between individual and small unit training and operating within a joint team structure with the Air Force, Navy, and Marines. This training proposes to integrate Army operations, including indirect fire, small arms, and Stryker vehicles, and Army aviation, including helicopters and remotely piloted aircraft.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A/BAX</b> establishes new RA directly over the BAX in the DTA currently proposed to support controlled firing areas.</p> <p><b>Alternative A/DMPTR</b> establishes new RA directly over the DMPTR area located within YTA. This RA would provide protective areas for the hazardous activities and weapons safety footprints and would be of sufficient size to encompass hazardous activities and weapons footprints for the types of ordnance used in this area.</p>	<p><b>Attachment F</b></p> <p>Additional Proposed Airspace Changes</p>



<p><b>④ Night Joint Training</b></p> <p><b>Proposed Action:</b> In combat situations, conducting flight training during the hours of limited visibility using advanced night vision technology gives the U.S. military a distinct advantage. Training with this equipment can only be conducted at night.</p> <p><b>Key Components:</b> Extend the special use airspace (SUA) hours until 11:00 P.M., with landing by midnight, local time, during the months of March and October to accommodate flight training at night for major flying exercises (MFEs) and extend the Joint Pacific Alaska Range Complex (JPARC) operating hours for tactical flight operations. Coordinated Universal Time would be considered, which would provide the time-use stability by remaining on the sun clock in case daylight saving time is changed again.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> proposes to extend the SUA hours to accommodate night training for MFEs during March and October. The hours are currently set to cease training activities by 10:00 P.M., with landing by 11:00 P.M., local time.</p> <p><b>Alternative B</b> proposes to extend the JPARC operating hours to allow tactical flight operations until midnight and landing by 1:00 A.M., local time, during March and October. This would allow night training during these months from a minimum of 1.5 hours to a maximum of 2.5 hours for each exercise.</p> <p><b>Alternative C</b> proposes to extend the JPARC operating hours to allow tactical flight operations until midnight and landing by 1:00 A.M., local time, during all months of the year and for all training purposes, not just for MFEs, as is the current situation.</p>	<p><b>Attachment A</b></p> <p>JPARC Overview of EIS Proposed Actions and Alternatives</p>
<p><b>④ Remotely Piloted Aircraft (RPA) Access</b></p> <p><b>Proposed Action:</b> RPAs have emerged as a viable platform for reconnaissance and surveillance activities. RPA access throughout the Joint Pacific Alaska Range Complex (JPARC) ranges and airspace is critical to enhance JPARC training and exercises. <i>The following RPA corridors have been developed as individual, standalone proposed actions and alternatives:</i> Eielson Air Force Base (AFB) to Restricted Airspace 2211 (R-2211); Eielson AFB Class C airspace to R-2205; Allen Field to R-2202; R-2202 to R-2211; R-2205 to R-2202; Fort Wainwright to R-2211; and Fort Wainwright to R-2205.</p> <p><b>Key Components:</b> Establish new restricted airspace (RA) or other suitable airspace, such as a Certificate of Authorization (COA), as determined by the Federal Aviation Administration, to support RPA airspace corridors. RPA activity would be intermittent, activating RAs or COAs only during training or exercises when RPAs are required. Each corridor would be between 5 and 8 nautical miles in width and of varying altitudes.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> would establish new RA for each RPA corridor identified above.</p> <p><b>Alternative B</b> would establish a RA via a COA for each RPA corridor identified above.</p>	<p><b>Attachment F</b></p> <p>Additional Proposed Airspace Changes</p>

**⑩ Maneuver Space**

**Proposed Action:** Provide expanded maneuver ground space and year-round accessibility in the Army's Tanana Flats (TFTA), Donnelly (DTA), and Yukon (YTA) Training Areas, as well as new roadway access in TFTA.

**Key Components:** The expanded maneuver space would support year-round training access, internal circulation routes, and integration of proposed Intermediate Staging Bases. The training frequency at this time is planned to support six combat maneuver battalions training in these areas for a 10- to 14-day event at least once a year per battalion. The ground maneuver area could be used to train a Stryker company outside of the hazard footprints from aerial ordnance or indirect fire. The desired road surface would be a 35-foot-wide aggregate surface to allow two Stryker vehicles to pass.

**Action Alternatives:**

The only action alternatives developed to date involve proposed road access into the Blair Lakes area of TFTA, as shown on the corresponding map and described below. (Specific alternatives for direct access to DTA and YTA have not yet been developed to the point where a specific decision can be made.)

**TFTA Access Road Alternative A** follows the proposed railroad alignment 11 miles, and then crosses the Tanana Flats along an existing winter-access trail to higher ground around Blair Lakes.

**TFTA Access Road Alternative B** follows the proposed railroad alignment 8 miles before crossing the Tanana Flats toward Hill 1406. The route traverses the eastern slopes of Hill 1406, then a broad terrace southeast toward Blair Lakes, crossing Dry Creek near Blair Lakes.

**TFTA Access Road Alternative C** follows existing trail systems southwest across the Tanana Flats toward Hill 1406, avoiding open areas as much as possible. From Hill 1406, two possible routes to Blair Lakes are being considered: the first traverses the eastern slopes of Hill 1406 and then a broad terrace southeast toward Blair Lakes, crossing Dry Creek near Blair Lakes; the second route remains on the flats north of Hill 1406, crossing Dry Creek where the creek enters the flats, then running up the Dry Creek Valley to the higher ground around Blair Lakes.

**TFTA Access Road Alternative D** is similar to Alternative C, except it takes a more direct route from the Tanana River toward Hill 1406. From Hill 1406, two routes to Blair Lakes are being considered: the first traverses the eastern slopes of Hill 1406, then a broad terrace southeast toward Blair Lakes, crossing Dry Creek near Blair Lakes; the second route remains on the flats north of Hill 1406, crossing Dry Creek, and then running up the Dry Creek Valley to higher ground around Blair Lakes.

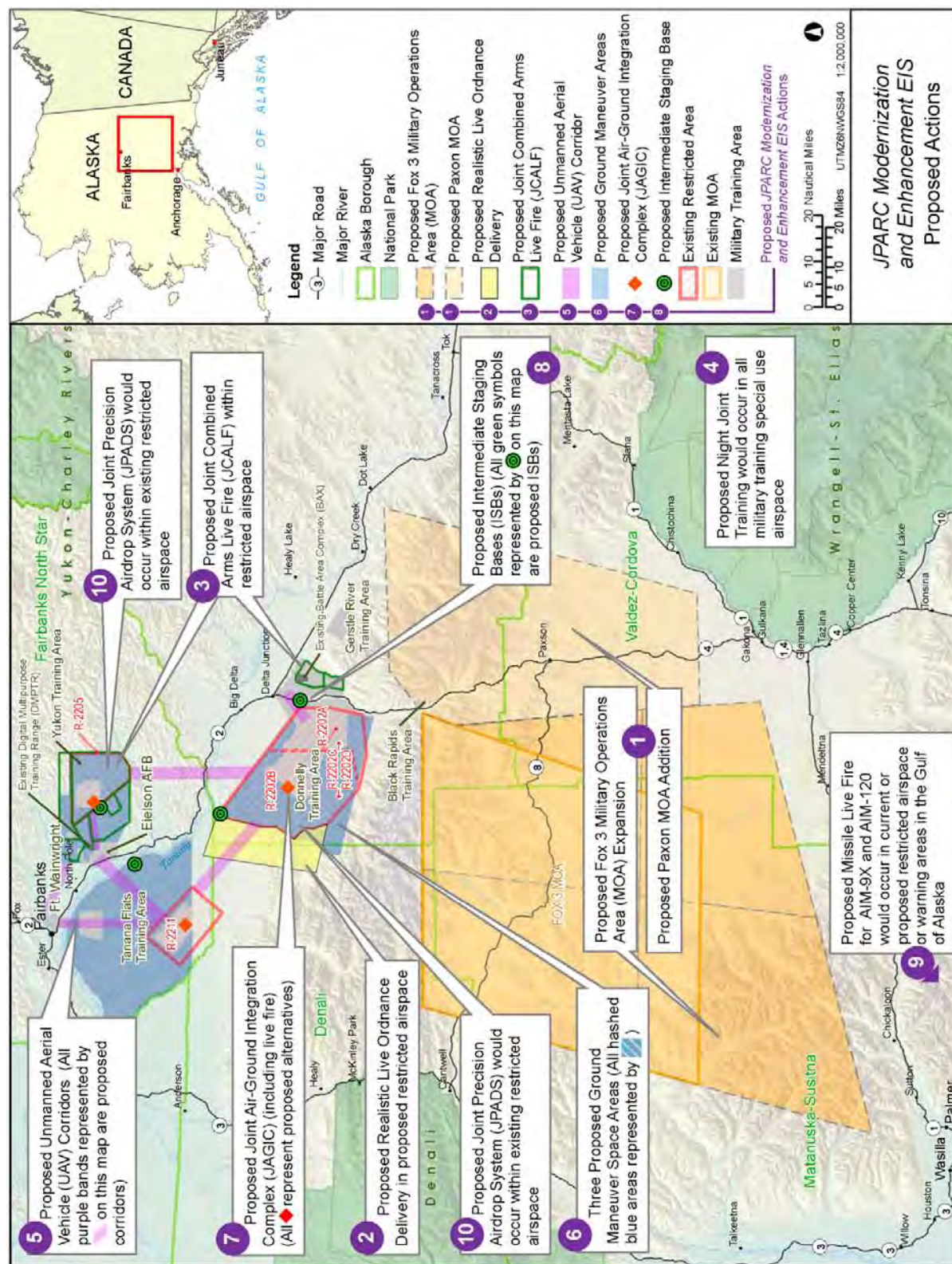
**Attachment G**

**Additional Proposed  
Ground Changes**

<p><b>Joint Air-Ground Integration Complex (JAGIC)</b></p> <p><b>Proposed Action:</b> The JAGIC is a proposed Joint Pacific Alaska Range Complex capability for joint and combined live training. The JAGIC would allow Army-combined arms capabilities to jointly operate with the Air Force and Navy air-to-air and air-to-ground capabilities along with special operations forces.</p> <p><b>Key Components:</b> The JAGIC is a digitally integrated combat training area with a total footprint of approximately 912 by 128 km in size. The JAGIC would consist of target arrays with service roads, range support buildings, parking area, range tower, convoy live-fire route, urban centers, and an area for rocket training. Most of the target arrays, the convoy live-fire route, and the urban facilities would be concentrated in a 9- by 612-km area within the range. The JAGIC would be strategically placed to provide adequate airspace and controlled-access land for the safety buffers needed to train with a full range of munitions that may be used in combat.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> proposes to locate the JAGIC in the central area of DTA-West, proximate to the western boundary of the Oklahoma Impact Area.</p> <p><b>Alternative B</b> proposes to locate the JAGIC in the Stuart Creek Impact Area within YTA.</p> <p><b>Alternative C</b> proposes to locate the JAGIC in the Blair Lakes Impact Area near the southern boundary of the Tanana Flats Training Area under the existing Restricted Airspace 2211 (R-2211).</p>	<p><b>Attachment G</b></p> <p><b>Additional Proposed Ground Changes</b></p>
<p><b>Intermediate Staging Bases (ISBs)</b></p> <p><b>Proposed Action:</b> Locate and construct a 1,000-Soldier ISB near the existing Battle Area Complex (BAX), along with three 200- to 500-Soldier ISBs at Yukon Training Area (YTA), Donnelly Training Area-West (DTA-West), and Salcha.</p> <p><b>Key Components:</b> The ISBs would include permanent barracks, large parking areas, dining facilities, ammunition storage points, petroleum-oil lubricant areas, maintenance facilities, and possible airfields to house, maintain, and stage soldiers before insertion into surrounding combat training areas. They would also provide maintenance and logistics support away from main cantonment areas.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> is to provide a permanent 1,000-Soldier ISB near existing BAX, along with three permanent 200- to 500-Soldier ISBs at YTA, DTA-West, and Salcha. The facility would be for joint use, not Army use only. These are proposed at key points along the planned rail corridor close to the planned bridge crossings.</p> <p><b>Alternative B</b> is to use existing temporary "relocatable" ISB facilities over the next 7 years, and then replace them with permanent facilities.</p>	

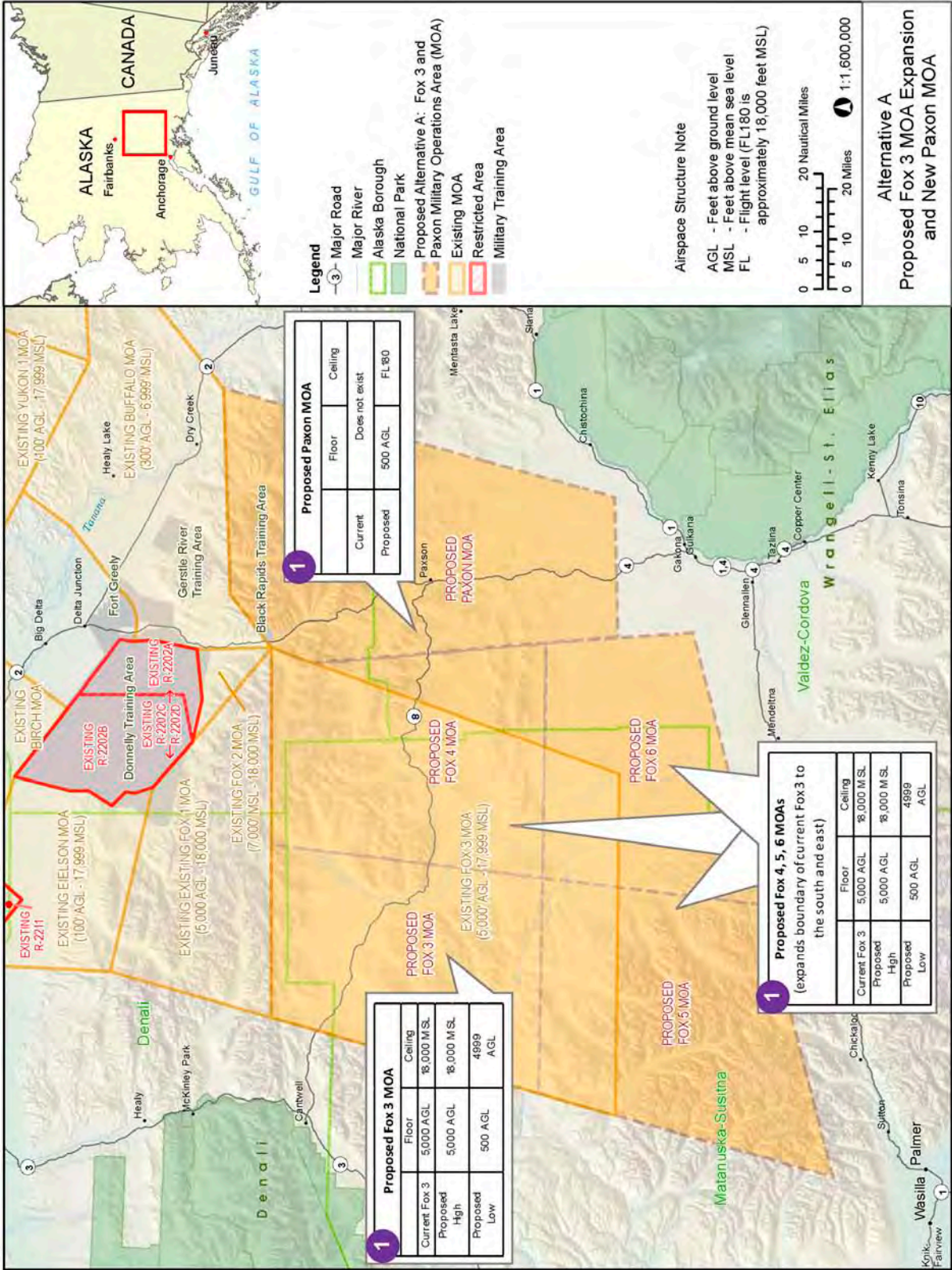


<p><b>④ <u>Missile Live Fire for AIM-9X and AIM-120</u></b></p> <p><b>Proposed Action:</b> The AIM-9X and AIM-120 missile systems are the main air-to-air armaments for the F-22 Raptor. For effective training to be conducted with these systems, live training shots need to be executed as part of both individual pilot training and joint training exercises with other air and ground units, such as Northern Edge.</p> <p><b>Key Components:</b> Live ordnance delivery requires use of either restricted airspace with range target areas or a warning area of sufficient size to contain the explosive hazard areas associated with these missile systems. Instrumentation would be needed to control drones, radar, radio relays, and weapon telemetry and termination equipment in support of this training activity.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> proposes that the existing Temporary Maritime Activities Area (300 nautical miles [NM] long by 150 NM wide, 0 feet above ground level [AGL] – flight level (FL) 600; includes subsurface operating areas), and Warning Area 612 (WA-612) (0 feet AGL – FL290) in the Gulf of Alaska be considered for the missile live fire delivery of the AIM-9X and AIM-120 missiles by Air Force F-22 fighter aircraft.</p>	<p><b>Attachment H</b></p> <p><b>Proposed Missile Live Fire for AIM-9X and AIM-120 in the Gulf of Alaska Temporary Maritime Activities Area and Warning Area 612</b></p>
<p><b>⑩ <u>Joint Precision Airdrop System (JPADS) Drop Zones</u></b></p> <p><b>Proposed Action:</b> Provide JPADS drop zones as part of Joint Pacific Alaska Range Complex training exercises.</p> <p><b>Key Components:</b> Utilize current or proposed restricted airspace to support JPADS drop zone training with a system of global positioning system receivers and steerable parachutes to support aerial resupply training under realistic and varied conditions.</p> <p><b>Action Alternatives:</b></p> <p><b>Alternative A</b> proposes conducting reduced operations in Restricted Airspace 2205 (R-2205) in the Yukon Training Area.</p> <p><b>Alternative B</b> proposes conducting reduced operations in the Donnelly Training area Oklahoma Impact Area.</p> <p>(The key distinction between Alternatives A and B is that Restricted Airspace 2205 currently has more time available to accommodate JPADS Drop Zone training exercises.)</p>	<p><b>Attachment G</b></p> <p><b>Additional Proposed Ground Changes</b></p>



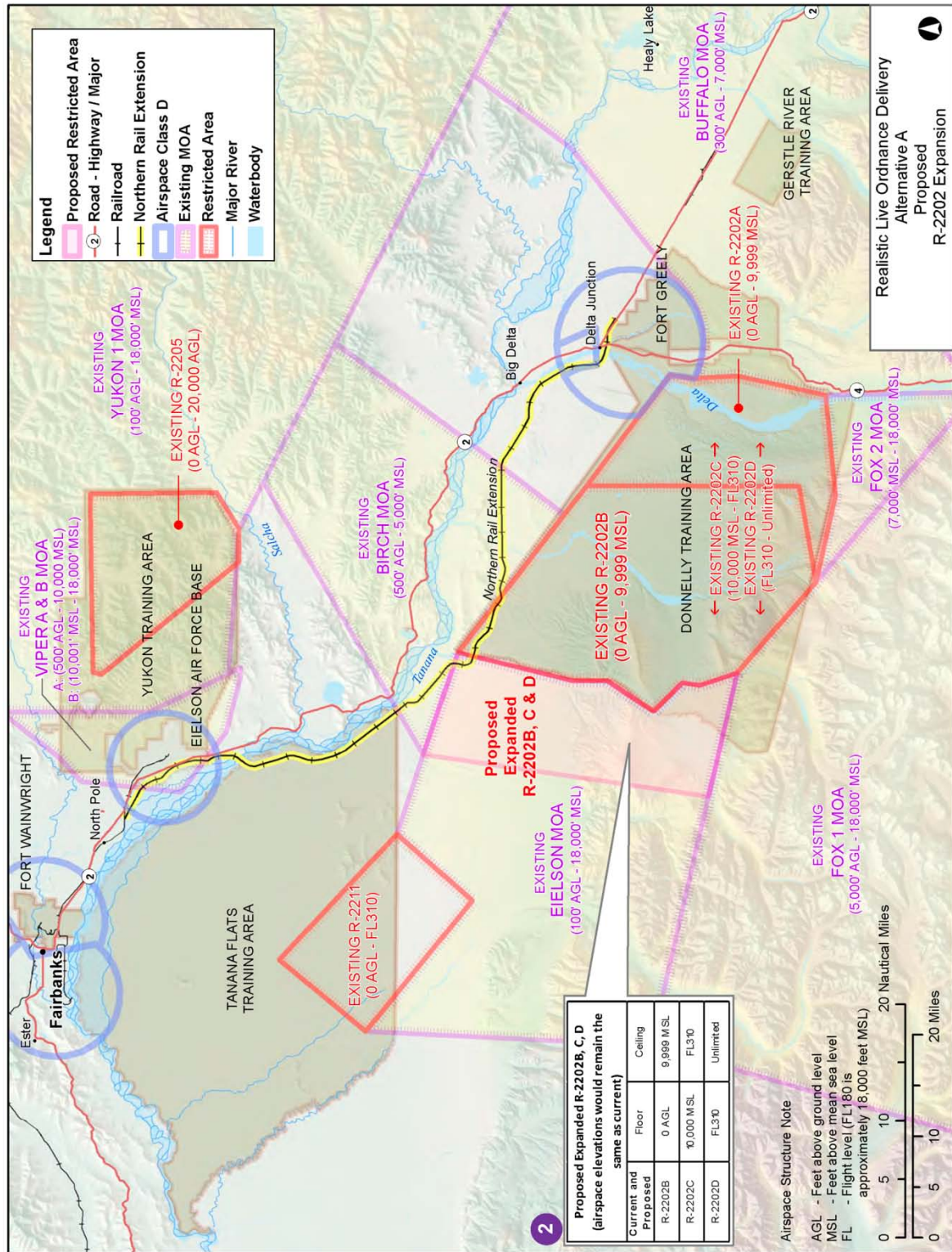
**Attachment A: JPARC Overview of EIS Proposed Actions and Alternatives**





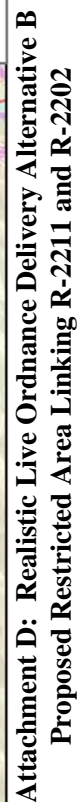
Attachment B: Proposed Fox MOA Expansion



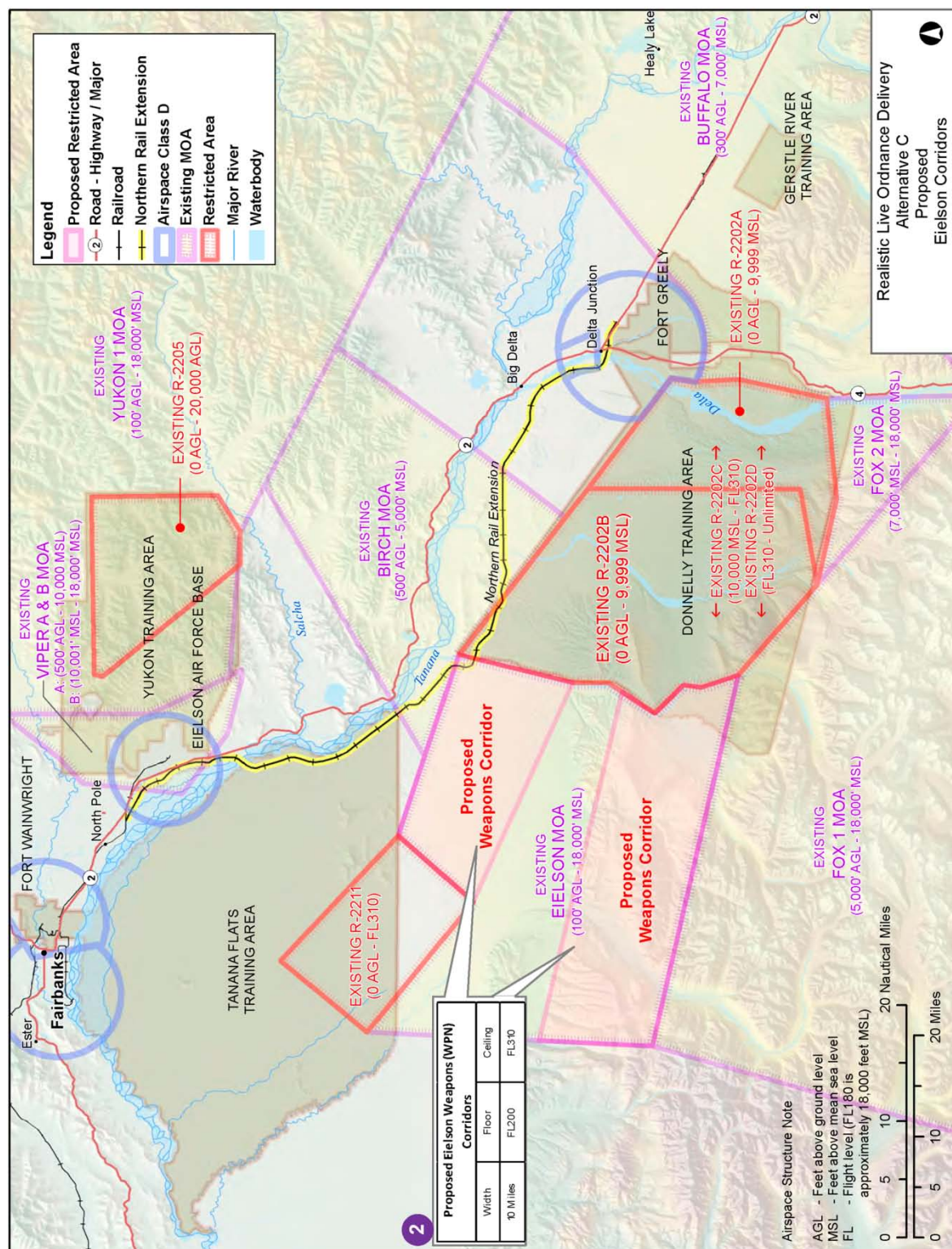


Attachment C: Realistic Live Ordnance Delivery Alternative A  
Proposed R-2202 Expansion







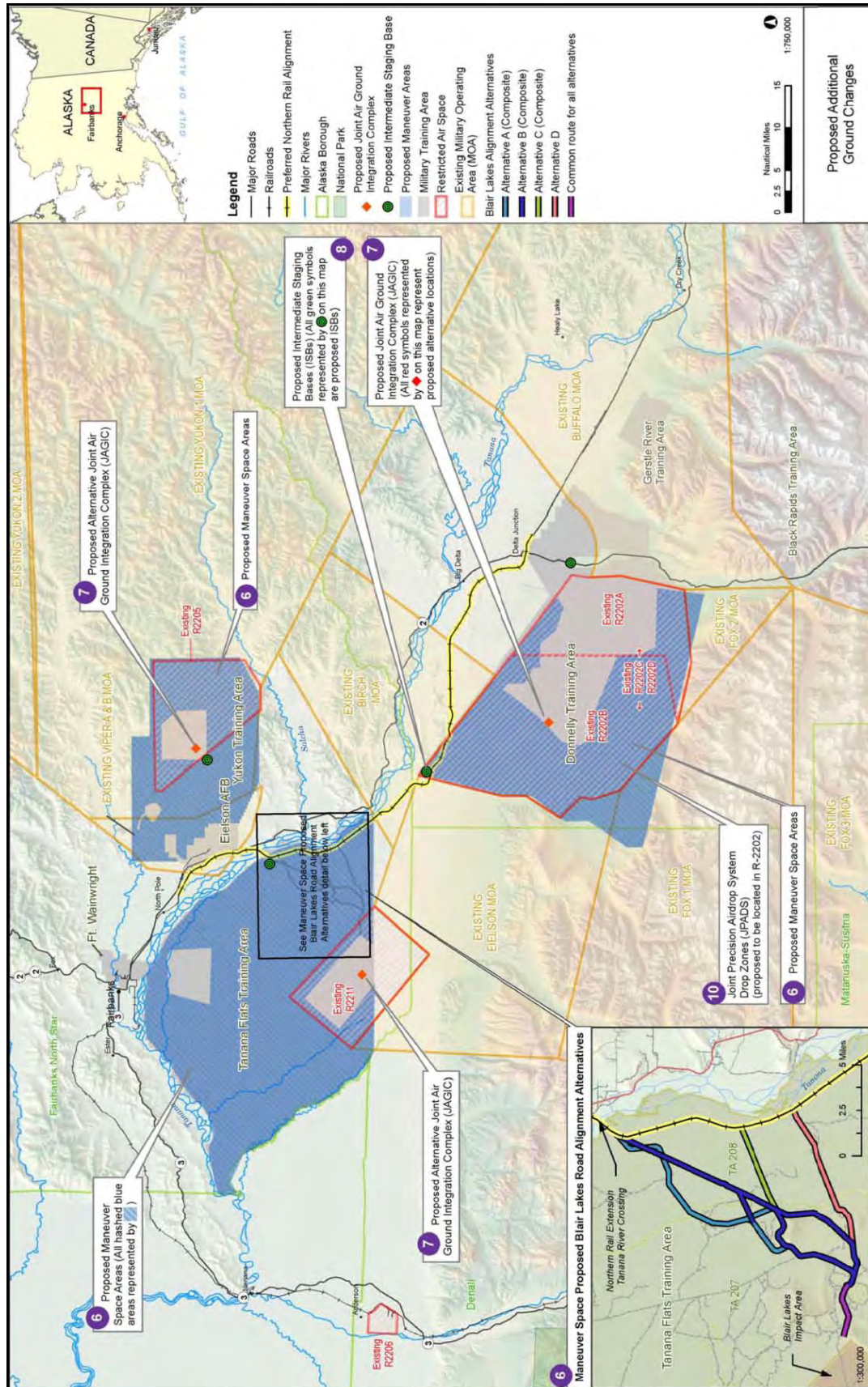


## Attachment E: Realistic Live Ordnance Delivery Alternative C Proposed Eielson Weapons Corridors









**Attachment G: Additional Proposed Ground Changes**





**Alaska Native Government-to-Government  
Consultation Letter Mailing List**

Larry Sinyon, President, Cheesh-na Tribal Council (old Native Village of Chistochina)  
Doug Wade, Chairman, Chickaloon Native Village  
Solomon John, First Chief, Circle Native Community  
Dorothy Cook, President, Eklutna Native Village  
Roy S. Ewan, President, Gulkana Village  
JoAnn Polston, Chief, Healy Lake Traditional Council  
Phyllis Amodo, First Chief, Kaguyak Village  
Debra Call, President, Knik Village  
Gordon Pullar, Council President, Lesnoi Village  
Nora David, First Chief, Mentasta Traditional Council  
Speridon Mitch Simeonoff, President, Native Village of Akhiok  
Veronica Nicholas, President, Native Village of Cantwell  
Larry Evanoff, President, Native Village of Chenega  
Ronald Mahle, President, Native Village of Chitina  
Joyce Roberts, First Chief, Native Village of Eagle  
Robert Henrichs, President, Native Village of Eyak  
Darin Gene, President, Native Village of Gakona  
Carl Pete, President, Native Village of Kluti-Kaah  
Wally Kvasnikoff, First Chief, Native Village of Nanwalek  
Alex Ambrosia, President, Native Village of Ouzinkie  
Patrick Norman, First Chief, Native Village of Port Graham  
Arnold Kewan, President, Native Village of Port Lions  
Roy Denny, President, Native Village of Tanacross  
Lori Johnson, President, Native Village of Tatitlek  
John Goodlataw, President, Native Village of Tazlina  
Donald Adams, President, Native Village of Tetlin  
Frank Stanifer, President, Native Village of Tyonek  
William Lord, First Chief, Nenana Native Association  
Belinda Thomas, President, Northway Village  
Crystal Collier, President, Seldovia Village Tribe  
Brenda Schwantes, Chairman, Sun'aq (Shoonaq)  
Ruth Dawson, Chairman, Village of Afognak  
William Miller, President, Village of Dot Lake  
Conrad Peterson, President, Village of Old Harbor  
Victoria Demmert, President, Yakutat Tlingit Tribe

### L.2.3 Alaska Native Government-to-Government Section 106 Consultation Notification Letters



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Ms. Belinda Thomas, Tribal Administrator  
Northway Village  
P.O. Box 516  
Northway, Alaska 99764

Dear Ms. Thomas

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Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

Attachments:

1. Fox 3 MOA Expansion and New Paxon MOA Proposal
2. Realistic Live Ordnance Delivery Proposal
3. Night Joint Training Proposal
4. AK SHPO Concurrence

*Guardian of the North*

***JPARC Modernization and Enhancement  
Environmental Impact Statement***



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

James Mery, Senior Vice President  
Doyon Limited  
1 Doyon Place, Suite 300  
Fairbanks, Alaska 99701

Dear President Mery

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Vice Commander

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PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Roy Denny, President  
Tanacross Village Council  
P. O. Box 76009  
Tanacross, Alaska 99776

Dear President Denny

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Environmental Impact Statement***



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Donald Adams, President  
Native Village of Tetlin (IRA)  
P.O. Box 797  
Tetlin, Alaska 99779

Dear President Adams

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PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. William J. D. Lord, First Chief  
Nenana Native Association  
P.O. Box 369  
Nenana, Alaska 99729

Dear Chief Lord

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Environmental Impact Statement***



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Ms. JoAnn Polston, President  
Healy Lake Village  
P.O. Box 74090  
Fairbanks, Alaska 99706

Dear President Polston

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Vice Commander

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PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Conan Goebel, First Chief  
Native Village of Eagle (IRA)  
P.O. Box 19  
Eagle, Alaska 99738

Dear Chief Goebel

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Environmental Impact Statement***



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force, Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Ms. Veronica Nicholas, President  
Native Village of Cantwell  
P.O. Box 94  
Cantwell AK 99729

Dear President Nicholas

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JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

MAR 02 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. William J. Miller, President  
Village of Dot Lake  
P. O. Box 2279  
Dot Lake, Alaska 99737

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PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Ms. Kathryn Martin  
Vice President of Land and Resources, AHTNA Inc.  
P.O. Box 649  
Glennallen AK 99588

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*Guardian of the North*



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99508

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Eric Rice, President  
(or current President)  
Village of Dot Lake  
P. O. Box 2279  
Dot Lake Alaska 99737

Dear President Rice


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OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
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JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

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(or current First Chief)  
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Eagle Alaska 99738

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ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Ms. JoAnn Polston, President  
(or current President)  
Healy Lake Village  
P.O. Box 74090  
Fairbanks Alaska 99706

Dear President Polston

The U.S. Department of Air Force and the Army are planning a modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC) pursuant to the Department of Defense joint training needs to allow for optimum use of land, air, and physical assets. This project is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act.

The *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska* contains six definitive proposals. The Air Force has completed Section 106 consultation for three projects: Fox 3 Military Operating Area (MOA) Expansion and New Paxon MOA, Realistic Live Ordnance Delivery (RLOD), and Night Joint Training (NJT) proposals. The U.S. Army Garrison Fort Wainwright is conducting Section 106 consultation for the remaining three projects.

The Alaska State Historic Preservation Office (AK SHPO) concurs, Attachment 1, with the determination that a finding of No Historic Properties Affected is appropriate for the RLOD proposed action. Survey results are attached, Attachment 2, that supports this finding.

If you have any questions or require additional information, you may contact Erin Marynak by phone at (907) 552-3791 or by e-mail at [erin.marynak.ctr@us.af.mil](mailto:erin.marynak.ctr@us.af.mil).

Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

Attachments:

1. AK SHPO Concurrence
2. Realistic Live Ordnance Delivery Survey Results

*Guardian of the North*





PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Donald Charlie, First Chief  
(or current First Chief)  
Nenana Native Association  
P.O. Box 369  
Nenana Alaska 99729

Dear Chief Charlie

The U.S. Department of Air Force and the Army are planning a modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC) pursuant to the Department of Defense joint training needs to allow for optimum use of land, air, and physical assets. This project is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act.

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Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

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*Guardian of the North*

***JPARC Modernization and Enhancement  
Environmental Impact Statement***

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PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Donald Adams, President  
(or current President)  
Native Village of Tetlin (IRA)  
P.O. Box 797  
Tetlin Alaska 99779

Dear President Adams

The U.S. Department of Air Force and the Army are planning a modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC) pursuant to the Department of Defense joint training needs to allow for optimum use of land, air, and physical assets. This project is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act.

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Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

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*Guardian of the North*



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Roy Denny, President  
(or current President)  
Tanacross Village Council  
P. O. Box 76009  
Tanacross Alaska 99776

Dear President Denny

The U.S. Department of Air Force and the Army are planning a modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC) pursuant to the Department of Defense joint training needs to allow for optimum use of land, air, and physical assets. This project is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act.

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If you have any questions or require additional information, you may contact Erin Marynak by phone at (907) 552-3791 or by e-mail at [erin.marynak.ctr@us.af.mil](mailto:erin.marynak.ctr@us.af.mil).

Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

Attachments:

1. AK SHPO Concurrence
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*Guardian of the North*

***JPARC Modernization and Enhancement  
Environmental Impact Statement***



PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. James Mery, Senior Vice President  
Doyon Limited  
1 Doyon Place, Suite 300  
Fairbanks Alaska 99701

Dear President Mery

The U.S. Department of Air Force and the Army are planning a modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC) pursuant to the Department of Defense joint training needs to allow for optimum use of land, air, and physical assets. This project is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act.

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Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

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PACIFIC AIR FORCES  
ELEVENTH AIR FORCE  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

OCT 12 2012

Colonel Patrick O. Moylan  
Eleventh Air Force  
Vice Commander  
9480 Pease Avenue, Suite 118  
Joint Base Elmendorf-Richardson Alaska 99506

Mr. Teddy Northway, President  
(or current President)  
Northway Village  
P.O. Box 516  
Northway Alaska 99764

Dear Mr. Northway


The U.S. Department of Air Force and the Army are planning a modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC) pursuant to the Department of Defense joint training needs to allow for optimum use of land, air, and physical assets. This project is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act.

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Sincerely

  
PATRICK O. MOYLAN, Colonel, USAF  
Vice Commander

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*Guardian of the North*

## **L.3 ESA CONSULTATION**

### **L.3.1 U.S. Fish and Wildlife Service**



United States Department of the Interior  
U.S. FISH AND WILDLIFE SERVICE  
Fairbanks Fish and Wildlife Field Office  
101 12<sup>th</sup> Avenue, Room 110  
Fairbanks, Alaska 99701

March 4, 2011



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

Re: Scoping Comments for JPARC Modernization and Enhancement EIS

Dear Lieutenant General Atkins:

Thank you for the opportunity to learn of the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement (EIS) at the public scoping meetings and at the Fairbanks agency meeting on January 21, 2011.

We understand your intent is to prepare an EIS that evaluates the potential environmental consequences associated with modernizing and enhancing current military ground and air training assets in Alaska. The actions would expand and/or establish new Military Training Areas (MOAs), restricted airspace, airspace corridors, expand access to training areas, and develop new ranges and facilities to support training activities.

We also appreciate the invitation to serve as a cooperating agency for this EIS. Instead, as I explained during our initial December 8, 2010 teleconference, the U.S. Fish and Wildlife Service (Service) would prefer to serve as a participating agency for this EIS, and has determined that the Fairbanks Fish and Wildlife Field Office will serve as the primary point of contact that will coordinate reviews and comments for the Service in Alaska.

Herein we identify environmental resources for consideration in the EIS, and convey any initial concerns regarding those resources. We look forward to working with you and your environmental planners to more fully identify issues and potential impacts for consideration in the environmental impact analysis process.

**Endangered Species:**

Currently, one federally-listed species under the jurisdiction of the Service occurs within the vicinity of the JPARC. That species is the short-tailed albatross (*Phoebastria albatrus*), which is listed as endangered under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq; 87 stat 884, as amended; ESA). It is a pelagic seabird whose range includes the Gulf of Alaska, and it typically occurs in the project area during the April through October time period. This endangered

species occurs in the area of the Proposed Action #9: Missile Live Fire for AIM-9X and AIM-120 in the Gulf of Alaska.

In 2010 the Service reviewed proposed Navy Training Activities in the Gulf of Alaska (two 3-week activity periods from April through October) and determined the activities were not likely to adversely affect endangered short-tailed albatrosses. For that review the Navy produced a Gulf of Alaska Navy Training Activities Biological Evaluation (BE), dated February 24, 2010 for the Temporary Maritime Activities Area. At this point the Service does not know specifically how the training activities proposed for this EIS compare, but recommend that the JPARC review the Protective Measures developed for short-tailed albatross in that 2010 Gulf of Alaska Navy Training BE to learn what steps can be taken to avoid adverse effects to that endangered species. The JPARC will need to evaluate of the effects of the Gulf of Alaska activities on the short-tailed albatross.

**Migratory Birds:**

Interior Alaska is significant nationally for its concentrations of migratory birds that breed, nest, and molt here during the brief spring and summer months. The Service has a significant amount of information from systematic aerial surveys since 1957 about the location and timing of nesting birds in Interior Alaska, and we look forward to sharing that information with you for the preparation of your Alternatives and production of your EIS. For example, the Service annually conducts the Alaska-Yukon Waterfowl Breeding Population Survey (for example, Mallek and Groves 2008) and also surveys on specific species, such as the Alaska Trumpeter Swan Status Report (Conant et al. 2007).

For the purposes of this scoping letter, we wish to make you aware of the high concentrations of breeding birds in many of the MOAs and Training Areas within the JPARC. As one example, aerial surveys in 2005 of the Gulkana area (which encompasses most of the Proposed Fox 3 MOA Expansion and New Paxson MOA) detected 2,440 breeding pairs of trumpeter swans, and 1,228 swan cygnets (chicks) (Conant et al. 2007), with Figure 1 showing the density of trumpeter swans during the spring and summer season in that area. Many other waterfowl also nest, molt and raise their young in that area.

The Service has concerns about the proposed low altitude flight training areas and their potential to disturb nesting and molting birds. The Service can provide years of breeding waterfowl survey information for much of the JPARC area, and can make specific timing recommendations for your activities to avoid conflicts with breeding birds.

**Eagle Nests:**

Bald and Golden Eagles, as well as their nests, are protected from take, including disturbance. The Service maintains a raptor-nest database that can provide an indication of past nest activity in proposed project areas. We would be happy to consult this database for your site-specific projects. This database, however, cannot guarantee future nesting activity, so we recommend conducting nest surveys in the early spring prior to construction and when the nests are active and easily identified. Should an active eagle nest be observed in the project area at any time during the project, we recommend reviewing our eagle permit website

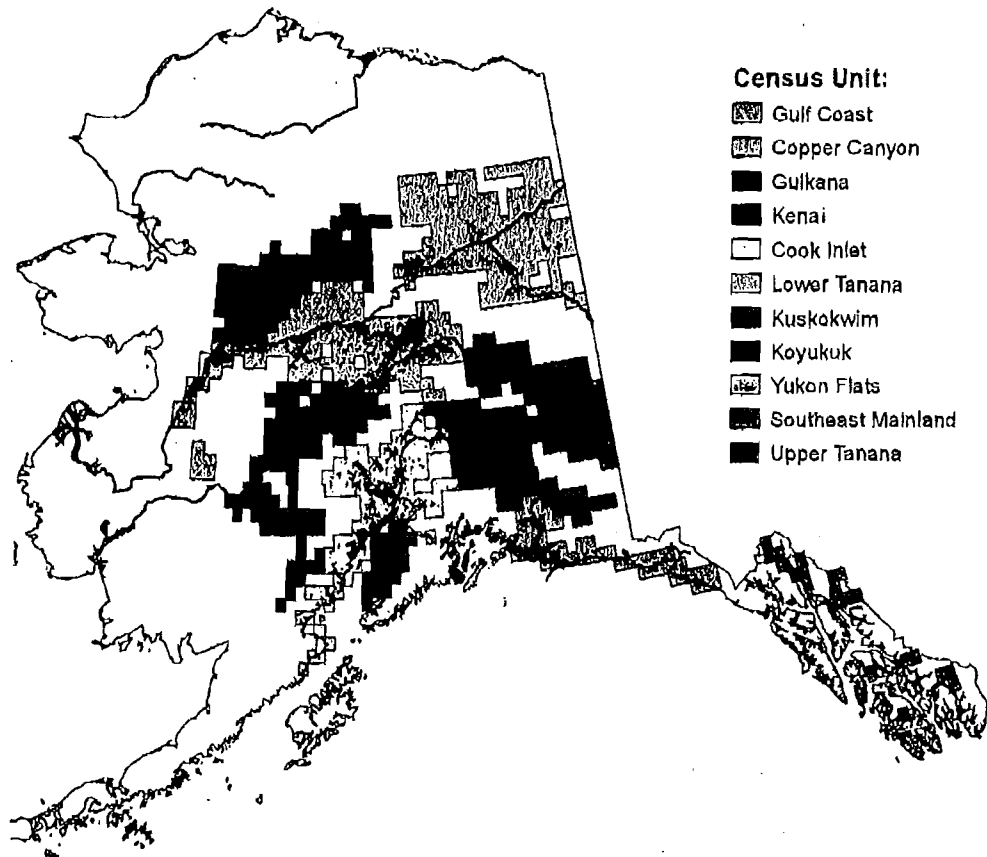


Figure 1. Density of Trumpeter Swans during the spring and summer of 2005 (Conant et al. 2007). Each of the 7,787 points represents a swan observation.

(<http://alaska.fws.gov/eaglepermit/index.htm>), and contacting our Regional Office ([permitsR7MB@fws.gov](mailto:permitsR7MB@fws.gov) or 907-786-3685) if you have questions.

**Land Clearing:**

Migratory bird nests, eggs or nestlings could be destroyed if work is conducted in nesting habitats during the spring and summer breeding season. Please refer to our recommended time periods, which vary by region, for avoiding vegetation clearing to protect nesting migratory birds ([http://alaska.fws.gov/fisheries/fieldoffice/anchorage/pdf/vegetation\\_clearing.pdf](http://alaska.fws.gov/fisheries/fieldoffice/anchorage/pdf/vegetation_clearing.pdf)). The Migratory Bird Treaty Act prohibits the willful killing or harassment of migratory birds. When practical for authorized military readiness activities, and for all other activities, the Service recommends that clearing, excavation and fill activities in potentially suitable nesting habitats be completed prior to



the nesting season to avoid impacts to breeding migratory birds. If this is not possible, then other measures for avoiding impacts to breeding migratory birds should be initiated. For example, vegetated areas could be cleared prior to the nesting season. This would render the area unsuitable for breeding birds prior to their arrival and facilitate work during the breeding season without impacts to birds. However, we do not recommend large areas (greater than 5 acres) be stripped of vegetation more than one month prior to initiating work, which could result in even greater damage caused by excessive erosion.

We no longer recommend conducting nest surveys during the breeding season as a way to avoid adversely impacting breeding birds. Because nesting birds are secretive, identifying active nests is very difficult, so there is a high likelihood that active nests will be undetected. Nests surveys are a poor substitute for project scheduling that avoids threatening nesting birds. If work cannot be conducted outside the nesting season, or the area cannot be made unsuitable for nesting prior to the breeding season, the project sponsor should demonstrate how they are preventing the willful killing or harassment of migratory birds.

**Impacts to Wetlands, Fish, Wildlife and Other Habitats:**

Quantifying temporary, indirect and permanent impacts for on-the-ground projects such as Proposed Actions 6 and 8 (enhanced access to ground maneuver space, and intermediate staging bases) are not possible at this stage in the planning process, however, we offer the following as ways to avoid and minimize potential adverse impacts.

Wetlands and Riparian Areas: The Service considers fens, emergent wetlands, ponds, sloughs, watercourses, and riparian areas as higher-value habitat types where disturbance should be avoided or minimized. Disturbance should also be avoided or minimized in other habitats, such as the relatively abundant scrub-shrub wetlands, but the impacts to fish and wildlife are relatively less and will be reflected in our recommendations to the Corps for wetland pennits.

Fish and Wildlife: We typically recommend wider buffers for anadromous fish streams than for resident fish streams (e.g., [http://alaska.fws.gov/fisheries/fieldoffice/fairbanks/pdf/1\\_nnpcover.pdf](http://alaska.fws.gov/fisheries/fieldoffice/fairbanks/pdf/1_nnpcover.pdf)). The Service recommends that design criteria for all stream crossings focus on protecting stream health by maintaining riparian and floodplain processes. All new constructed crossings should maintain the normative physical processes within the stream-floodplain-riparian corridor by: 1) promoting natural sediment transport patterns, 2) providing unaltered fluvial (riverine) debris movement, and 3) maintaining or restoring functional continuity and connectivity of the stream-floodplain-riparian corridor.

To avoid and minimize impacts to aquatic and riparian habitats, all crossings should consist of a bridge or culvert that spans the floodplain, thereby providing for long-term dynamic channel stability, retention of existing spawning habitats, maintenance of food (benthic invertebrate) production, and minimization of risk of failure. All crossing designs should be based on site-specific information such as: estimates of peak discharge, flow velocities and patterns; channel stability; suspended sediment and bed load transport; flooding regime (50-year to 100-year flood frequency and magnitude); cross-section profiles of channel morphology; and water surface elevations.

The Service would like to emphasize the importance of providing free and efficient fish passage for all life stages of fish, while also providing for hydrologic functions such as flushing flows, sediment bed loads, channel meandering and wetland integrity. Longitudinal connectivity (between upstream and downstream sections of a river), vertical connectivity (between the surface and ground water), and lateral connectivity (between a river and its floodplain and surrounding slopes) must be sustained to allow for proper hydrologic functioning.

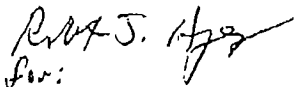
**Mitigation:**

Service policy regarding impacts to fish and wildlife habitat includes first avoiding, then minimizing, and finally compensating for the remaining unavoidable impacts. These impacts include direct, indirect and temporal impacts. If there are unavoidable impacts for proposed projects, then the Service recommends compensatory mitigation for the unavoidable impacts by restoring or permanently protecting equal or higher-value wetlands nearby. The type and extent of recommended mitigation for these impacts would normally be based upon the scarcity and value of the wetland habitat impacted by the proposed project as well as any associated indirect or temporal impacts caused by the project. For the more common wetlands, like scrub-shrub, we typically recommend lower compensation ratios. For higher-value wetlands, such as wetlands associated with watercourses, the Service recommends a strategy of no net loss when practicable. If this is not possible, then we typically recommend higher compensation ratios. Since habitat protection does not meet our national goal of no net loss of wetlands (i.e., no new wetlands are created or restored to offset the proposed loss of wetlands), we typically recommend higher mitigation ratios to help offset the consequences of not meeting this goal when habitat preservation is used for compensatory mitigation. This includes recommending higher mitigation ratios for in-lieu fee programs that only provide habitat protection.

**Conclusion:**

We look forward to sharing any information we may have regarding fish and wildlife resources in the vicinity of your activities. If you have any questions regarding this issue please contact Charleen Veach at 907/456-0272 or [charleen\\_veach@fws.gov](mailto:charleen_veach@fws.gov).

Sincerely,



Jewel Bennett, Chief  
Conservation Planning Assistance Branch

cc: Ann Rappoport, USFWS, Anchorage  
Christy Everett, USACE, Fairbanks

**Citations:**

Conant, B., J.I. Hodges, D.J. Groves, and J.G. King. 2007. Alaska Trumpeter Swan Status Report 2005. U.S. Fish and Wildlife Service, Waterfowl Management, Juneau, Alaska. 49 pp.

Mallek, E.J., and D. J. Groves. 2008. Alaska-Yukon Waterfowl Breeding Population Survey.

## L.3.2 State of Alaska Department of Fish and Game

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

SEAN PARNELL, GOVERNOR

333 Raspberry Road  
Anchorage, AK 99518-1599  
PHONE: (907) 267-2228  
FAX: (907) 267-2433

March 1, 2011

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

Subject: Issue Identification – Joint Pacific Alaska Range Complex

The Alaska Department of Fish and Game (Department) reviewed the December 8, 2010, "Department of the Air Force and U.S. Army; Notice of Intent To Prepare an Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska". We understand the intent of the EIS is to analyze the environmental effects and consequences of the proposed changes and their alternatives. This will include the environmental consequences to airspace, noise, safety, biological resources, socioeconomics, transportation, cultural resources, water resources, wetlands, air quality, land use, hazardous materials, recreation and visual resources, environmental justice and risks to children, subsistence, and cumulative impacts.

The Department appreciates the need and importance for the military to conduct training exercises that, as closely as possible, mimic battlefield conditions. The training conducted can save lives and contribute to the success of the military's national defense mission. Through the development of the EIS, we would like to work with the military to provide and assist in the interpretation of data where possible, and in understanding the area for fish, wildlife, their use and management.

The Department has specific concerns related to the potential impacts of the proposal to wildlife, the ability to perform management and research related to the management and research of fish and wildlife, and the ability of the public to access the area for activities related to the use of fish and wildlife for general and subsistence purposes. The expansion of low-level flight training exercises and other large-scale training exercises (including live fire) across the area under consideration could disturb wildlife in Game Management Units (GMU) 13 and 20. This area comprises one of the most popular and productive ecosystems in the state for the purposes of hunting, trapping, fishing and the harvests of trees, plants and other vegetation for subsistence and general use by the public.

The following comments are provided to assist the planning process in identifying issues for analysis during the EIS process.

### Potential Effects to Wildlife

The frequency of low-level flights as indicated in the EIS, and other large-scale training related noise could be a disturbance factor for wildlife of all species. Land mammals such as moose, caribou, bears, wolves and Dall sheep can experience reduced productivity due to disturbance during the

critical periods of birthing, breeding and use of wintering areas. Avian species such as waterfowl and raptors are especially vulnerable during spring and fall migration. Repeated low-level flight disturbance may also alter activity patterns, increasing vulnerability of both land and avian species to predation, particularly for young of the year. Additionally, to our knowledge, impacts of F-22 jet over flights to wildlife have not been evaluated, although noise generated by the F-22 is likely comparable to most aircraft of its class and impacts would likely be similar. This presents concerns, especially given the large expansion of the MOA.

The Nelchina Caribou Herd (NCH) has a very large range within Interior Alaska, and encompasses a significant portion of the area under consideration. The calving grounds of the NCH are relatively concentrated, with the Proposed Fox 5 area centered over it. The NCH typically concentrates in the eastern Talkeetna Mountain foothills from May through July. The NCH moves efficiently throughout this area to utilize new, highly nutritious emergent vegetation and to avoid insects. Caribou calves are born during the month of May, and for their first two months are highly vulnerable to disturbance. External stress during this period can affect caribou physical condition, reducing their survival and productivity. Low-level flight training exercises or other large scale training exercises (including live fire exercises, if any) in this mountainous-foothill terrain could affect the conservation of this herd, and impair the ability of those who rely on it for consumptive and other uses.

The proposed Paxson MOA with its floor of 500 ft AGL may create a disturbance for Dall sheep in the Delta River canyon. The mountainous terrain north of Black Rapids is an important Dall sheep lambing area and important ewe/lamb habitat. Low-level jet aircraft flights, large scale training and live-fire exercises through this area could have the potential to increase lamb mortality.

Human generated waste can attract wildlife, particularly bears, cause them to become habituated to humans, and result in negative interactions. With the addition of up to 1000 ground-based troops using the training area, consideration of how to deal with human generated waste and reducing the potential for negative interactions with wildlife should be analyzed in detail.

**Potential Effects to the Departments Administrative Activities for Management and Research Purposes.**

The Department is responsible for the sustainability of all fish and wildlife in the State of Alaska, regardless of land ownership or designation, and has the authority, jurisdiction, and responsibility to manage, control, and regulate fish and wildlife populations – including for subsistence purposes – unless specifically preempted by federal law. To perform these responsibilities, the Department has extensive management and research programs that include frequent access by staff to the lands, water, and airspace throughout the State, including the proposed JPARC expansion area.

After reviewing the information provided, Department staff identified concerns related to their ability to perform management and research activities for the administration of fish and wildlife resources in the area. These activities could be altered or potentially compromised by implementation of proposed flight and access restrictions and include potential safety issues due to air space and ground level separation and conflicts with military and Department aircraft operating simultaneously in the area. Additional concerns include restrictions related to the access and use of flight corridors, restrictions involving entry into areas for research and management purposes by air and ground access, and the poor radio communications capabilities that currently exist between civilians and the military in remote areas.

These concerns are exemplified by a review of the Department's extensive research and management activities for fish and wildlife in the Nelchina and Copper River basins in GMU 13. This area, almost completely encompassed by the JPARC expansion areas, comprise one of the most

popular and productive ecosystems in the state for the purposes of hunting, trapping, fishing, and berry picking; as well as other traditional and cultural uses. The area is easily accessed from Fairbanks, Anchorage, the Matanuska-Susitna Valley and Copper River basin communities via the Parks, Richardson, Glenn, and Denali highways. Common big game species in this area include black bear, brown bear, wolves, wolverine, moose, caribou, and sheep, and extensive fisheries resources consisting of both resident and anadromous species. Monitoring and managing the vast fish and wildlife resources in this area takes a tremendous amount of aerial survey work using both fixed wing and rotor aircraft throughout the year. Surveys are typically flown between 500' and 7000' above ground level (AGL) and are dependent on being able to rapidly deploy during good weather conditions, when they exist, and the ability to radio track, capture or make direct observations wherever animals of interest are located.

The Department is conducting long-standing, comprehensive management and research projects for moose in portions of GMU 20. Proposed restricted access corridors and expansion within GMU 20 would impair the ability of the Department to continue these projects, increase costs due to the need to circumvent airspace, schedule additional flights and cause researchers to reduce, abandon or forgo future projects monitoring moose or other species if predictable, adequate access to airspace cannot be assured.

Without continued free access to the airspace in the region, particularly below 7,000' (AGL), necessary fish and wildlife population management in this area could be reduced. A reduction in the quantity and quality of data could result in a need to manage species on a more conservative basis, leading to fewer opportunities for harvest, including subsistence harvest. Of particular concern is the active management of the Nelchina Caribou Herd, GMU 13 and 20 moose and wolf populations, and Gulkana River Chinook and sockeye salmon, all of which are highly sought by the public.

#### **Potential Effects to Public Uses**

As noted above, the JPARC expansion areas and proposed corridors encompass some of the most popular and productive ecosystems in the state for the purposes of hunting, trapping, fishing, and the harvests of trees, plants and other vegetation for subsistence and general use by the public. The area includes the Nelchina Public Use Area (AS 41.23.040), established by the legislature in 1985 to protect fish and wildlife habitat for continuing purposes, perpetuate and enhance public enjoyment of fish, wildlife and their habitat and to perpetuate and enhance general public recreation in a quality environment.

Public use of this area is an important regional component for outdoor activities. The use is extensive, occurs on a year round basis with access via highway vehicle, ORV, boat, snowmachine and aircraft. In GMU 13, for example, in 1996-97, 6135 hunters sought moose (933 accessing the area by aircraft), and 19,397 caribou hunters used the area. From 2004-08, the annual average angler use was; Chena River – 20,235 days fished, Tangle Lakes complex – 4,108 days fished, Gulkana River (includes Crosswind Lake) – 19,812 days fished, Tyone River drainage (include Lake Louise and Susitna Lake) – 6,630 days fished.

Proposed access restrictions that could accompany the expansion may have a chilling effect on the ability of the public to freely use and enjoy the area. Public access and spontaneous use associated with good weather days could be curtailed, as would public access of desired areas due to corridor closures, the need to request entry authorizations, and other restrictions to airspace, necessitating the public to incur additional costs in fuel and time to avoid military operations. Additionally, Alaska is notorious for poor weather related flying conditions and the ability of private pilots to comply with flight restriction under poor flying conditions may pose a hazard to both military and private pilots operating in the area.

With extensive, widely dispersed, year round public use of the area, low-level jet aircraft flights and large scale training exercises could have the potential to place the general public and the military in close proximity, resulting in concerns for public safety through unintentional contact.

The entire expansion area also encompasses a well-developed remote cabin system, often centered on lakes and rivers, with both year round and seasonal residents. These residents could expect to experience visual and sound disturbance associated with training exercises. Access to these cabins could be disrupted by the proposed flight restrictions.

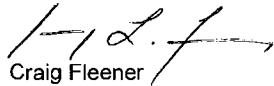
Subsistence uses within the JPARC area is also extensive and consists of the traditional and cultural uses of fish, wildlife and plants harvested throughout the year. The use of these resources is dependent on their continued sustainability and access. Throughout the planning process, we recommend holding meetings in local area communities to understand the effect of the proposed actions on subsistence uses.

#### **Information Development and Analysis**

Through the EIS process the Department encourages the development, presentation and analysis of additional data to assist in informing the decision making process. We recommend detailed maps and information be developed showing proposed flight corridors, restricted areas, seasonality of use and areas where air and ground training may be conducted, including live fire exercises. These uses should then be analyzed in relation to the primary issues we have identified; potential affects to wildlife; potential affects to the Departments management and research activities and effects to the public's ability to access and use the area.

We are interested in working with the Department of Defense during the development of the EIS. Department staff have expertise regarding fish, wildlife and their use within the area and may be able to assist in the evaluation of spatial and temporal management options to facilitate the public's use of the area as well as ensuring our continued research and management efforts to ensure the sustainability of the resources in the area. Please contact Brad Palach at [brad.palach@alaska.gov](mailto:brad.palach@alaska.gov) or 267-2145 to assist in coordinating your efforts.

Sincerely,



Craig Fleener  
Deputy Commissioner  
Department of Fish and Game  
State of Alaska

## L.4 SHPO CONSULTATION



HEADQUARTERS  
ALASKAN COMMAND (ALCOM)  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99506

January 11, 2012

Colonel Nathan C. Mooney II  
Headquarters Alaskan Command  
9480 Pease Avenue, Suite 303  
Joint Base Elmendorf-Richardson Alaska 99506-2200

Ms. Judith Bittner  
Alaska State Historic Preservation Officer  
Office of History and Archaeology  
Department of Natural Resources  
550 West 7<sup>th</sup> Avenue, Suite 1310  
Anchorage Alaska 99501

Dear Ms. Bittner

The Alaskan Command (ALCOM) requests your concurrence with the finding of No Historic Properties Affected for three proposed actions: Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, Realistic Live Ordnance Delivery (RLOD), and Night Joint Training (NJT).

The military land ranges, maritime training areas, and airspace that compose the Joint Pacific Alaska Range Complex (JPARC) provides a critical training and testing environment to the U.S. Department of Defense (DOD) units based in Alaska. Pursuant to guidance and philosophy found in DOD Directive 1322.18, *Military Training*, and in the U.S. Pacific Command's Alaska Joint Training Program of Excellence, ALCOM has coordinated with the Services (Army, Navy, and Air Force) to develop a strategy to identify joint training opportunities in Alaska, to maximize the utilization of scarce training resources, and to improve joint context training at all levels.

The *Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska* contains six definitive proposals. Of the six, the U.S. Army Garrison Fort Wainwright, Alaska will be conducting any needed Section 106 consultation for three of the projects affecting Army-managed lands. The Air Force will be conducting any additional Section 106 consultation for the three remaining projects that are referenced in this letter. The following potential effects have been consolidated from these proposals:

### **Fox 3 MOA Expansion and New Paxon MOA**

**Area of Potential Effects:** The Area of Potential Effects for this proposal consists of the land beneath the proposed Fox 3 MOA expansion and the proposed new Paxon MOA [Attachment 1].

**Noise:** Scientific studies of the effects of noise and vibration on historic properties have considered potential impacts on historic buildings, prehistoric structures, water tanks, archaeological cave/shelter sites, and rock art. These studies have concluded that overpressures generated by supersonic overflight were well below established damage thresholds and that

*Guardian of the North*

subsonic operations would be even less likely to cause damage. Thus, resources are unlikely to be affected by aircraft overflights.

**Ground Disturbance:** It is expected that there would be minimal ground disturbance associated with the action. The additional dry targets proposed would be trailers and nonfunctional threat vehicles that would be located on existing highway pullouts, campgrounds, gravel pits, or similar temporary locations. No new construction would be associated with this action.

**Cultural Resources:** There are no National Register-listed properties beneath the proposed Fox 3 expansion or the proposed new Paxon MOA.

#### **Realistic Live Ordnance Delivery**

**Area of Potential Effects:** The Area of Potential Effects for the proposed RLOD undertaking consists of the Oklahoma Impact Area and two new temporary target areas within Donnelly Training Area, the Blair Lakes Impact Area of Tanana Flats Training Area, and the land beneath the existing Eielson MOA where the expanded or new restricted areas would be located [Attachment 2]. Similar to the proposed Fox 3 MOA expansion and the proposed new Paxon MOA described above, the potential for the undertaking (establishment of expanded or new restricted areas and their training use) to have adverse effects on historic properties is very low.

**Noise:** The annual average noise levels under the proposed action are not expected to noticeably change. Changes in instantaneous noise levels of less than 3 decibels (dB) are typically not noticeable in non-laboratory conditions, nor would the noise be sufficient to damage any archaeological or historical architectural sites. Scientific studies of the effects of noise and vibration on historic properties have considered potential impacts on historic buildings, prehistoric structures, water tanks, archaeological cave/shelter sites, and rock art. These studies have concluded that overpressures generated by supersonic overflight were well below established damage thresholds and that subsonic operations would be even less likely to cause damage.

**Ground Disturbance:** There would be no significant construction activities associated with the RLOD proposed action. Ground disturbance would result from the establishment of two new target areas within Donnelly Training Area and their training use for the delivery of inert ordnance.

**Cultural Resources:** There are no National Register-listed properties beneath the Realistic Live Ordnance Delivery proposed action. The general locations of the proposed target areas will be surveyed for the presence of cultural resources, and the final target sites and impact areas will be established where no cultural resources are located. Should resources of cultural significance be discovered, range officers would alert US Army Garrison Fort Wainwright's Cultural Resource Manager.

#### **Night Joint Training**

**Area of Potential Effects:** The Area of Potential Effects for the proposed NJT undertaking consists of the existing Special Use Airspace (SUA) [Attachment 3]. Similar to the proposed undertakings described above, the potential for the NJT undertaking (extending operating hours to allow after-dark events for the Air Force during major exercises) to have adverse effects on historic properties is very low, and identification efforts were limited to searches of the records of the National Register of Historic Places and National Historic Landmarks Program.



**Noise:** Noise levels experienced on the ground would be exactly the same as noise levels experienced currently, but noise events would occur at later times. Several noise-sensitive areas have been established in areas beneath JPARC SUA, and pilots avoid these areas during training.

**Ground Disturbance:** There would be no ground effects associated with the NJT proposed undertaking.

**Cultural Resources:** Several National Register-listed properties underlie JPARC SUAs. However, since the proposal does not involve any changes in the structure or dimensions of military airspace, there would be no new impacts on cultural resources.

Based on the nature of the proposed actions, no historic properties will be affected within the Areas of Potential Effect for the Fox 3 MOA Expansion and New Paxon MOA, Realistic Live Ordnance Delivery, and Night Joint Training proposals. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), and according to the regulations governing Section 106, 36 CFR Part 800 "Protection of Historic Properties," a determination is made of No Historic Properties Affected.

All correspondence associated with this consultation will be included in the Administrative Record of the EIS. The Draft EIS is scheduled for release on March 30, 2012. If you have any questions regarding the proposals or regarding this request, please feel free to contact Mr. Jamie Spell at (907) 552-1695, LTC Russell Price at (907) 552-3683, or Ms. Erin Marynak at (907) 552-3791.

Sincerely



NATHAN C. MOONEY II, Colonel, USAF  
Director for Logistics

Attachments:

1. Fox 3 MOA Expansion and New Paxon MOA Proposal
2. Realistic Live Ordnance Delivery Proposal
3. Night Joint Training Proposal

# STATE OF ALASKA

## DEPARTMENT OF NATURAL RESOURCES DIVISION OF PARKS & OUTDOOR RECREATION OFFICE OF HISTORY AND ARCHAEOLOGY

**SEAN PARNELL, GOVERNOR**

550 WEST 7<sup>TH</sup> AVENUE, SUITE 1310  
ANCHORAGE, ALASKA 99501-3565

PHONE: (907) 269-8721  
FAX: (907) 269-8908

January 23, 2012

File No.: 3130-1R AIR FORCE

Nathan C. Mooney II, Colonel, USAF  
Director for Logistics  
Headquarters Alaskan Command  
9480 Pease Avenue, Suite 303  
JBER, AK 99506-2200

Subject: Alaskan Command (ALCOM) Three Proposed Actions: Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, Realistic Live Ordnance Delivery (RLOD), and Night Joint Training (NJT)

Dear Colonel Mooney:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence (dated January 11, 2012) on January 12, 2012. We also greatly appreciate the information provided to our staff by Ms. Erin Marynak regarding the subject undertakings during a conference call on January 18.

Following our review of the documentation provided, we concur with your determination that a finding of **no historic properties affected** is appropriate for the Fox 3 MOA Expansion and New Paxon MOA and the Night Joint Training. We understand that these undertakings will involve no new ground disturbance and there would be no substantive change in noise levels that could potentially affect historic properties.

As discussed with Ms. Marynak on January 18, we are unable to concur with your proposed finding of effect for the Realistic Live Ordnance Delivery (RLOD) undertaking at this time. As there are plans to survey the proposed target areas for historic properties, we would greatly appreciate receiving the results of that inventory prior to providing our concurrence.

Should unidentified archaeological resources be discovered in the course of the projects, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4) or the Alaska Landmarks Register in consultation with our office.


Thank you for the opportunity to comment. We look forward to continued consultation on the RLOD undertaking. Please contact Shina duVall at 269-8720 or [shina.duvall@alaska.gov](mailto:shina.duvall@alaska.gov) if you have any questions or if we can be of further assistance.


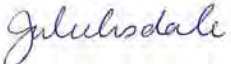

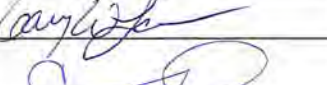
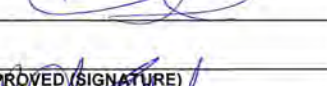
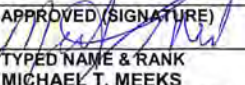
Sincerely,



Judith E. Bittner  
State Historic Preservation Officer

JEB:sad

 Printed on Recycled Paper

		<b>STAFF SUMMARY</b>		DATE: 7 February 2012	
<b>TO</b> Director of Public Works		<b>FROM</b> Environmental Division-Cultural Resources			
<b>SUBJECT:</b> The Unmanned Aerial Vehicle Corridor Development, Digital Multipurpose Training Range Airspace Expansion, and Battle Area Complex Airspace and Footprint Expansion		<b>ACTION OFFICER (SIGNATURE)</b> 		<b>SUSPENSE</b>	
		<b>TYPED NAME, RANK &amp; PHONE</b> Julie Esdale Archaeologist 361-9405			
<b>Reason for Action:</b> <b>FACTS/DISCUSSION</b> Section 106 of the National Historic Preservation Act requires federal agencies to consider effects undertakings may have on historic properties and provide Advisory Council on Historic Preservation an opportunity to comment.  The attached is a 106 consultation letter for USAG FWA projects: The Unmanned Aerial Vehicle (UAV) Corridor Development, Digital Multipurpose Training Range (DMPTR) Airspace Expansion, and Battle Area Complex (BAX) Airspace and Footprint Expansion on Fort Wainwright, Alaska. The finding for the first two projects is <b>No Historic Properties Adversely Affected</b> and the finding for BAX Airspace Expansion is <b>Historic Properties Adversely Affected</b> .					
<b>RECOMMENDATIONS:</b> Sign attached letter.					
<b>COORDINATION</b>					
OFFICE	SIGNATURE	CONCUR	NONCONCUR		
Cultural Resources Manager		2/7/12			
Chief, Conservation		2/7/12			
Chief, Environmental Division		2/7/12			
ENCLOSURES	<b>APPROVED (SIGNATURE)</b> 	<b>DISAPPROVED (SIGNATURE)</b>			
	<b>TYPED NAME &amp; RANK</b> MICHAEL T. MEEKS Director, Directorate of Public Works	<b>TYPED NAME &amp; RANK</b> MICHAEL T. MEEKS Director, Directorate of Public Works			

 USARAK Form 407  
 1 JAN 95

**Office of History and Archaeology: Cultural Resources Report Coversheet**  
**(Must Accompany All Compliance Reports Submitted to OHA/SHPO)**



Office of History and Archaeology  
Division of Parks & Outdoor Recreation  
Alaska Department of Natural Resources  
550 W. 7<sup>th</sup> Ave., Suite 1310  
Anchorage, AK 99501-3565

Phone: (907) 269-8721  
Fax: (907) 269-8908  
<http://www.dnr.state.ak.us/parks/oha/index.htm>

Was this survey/investigation (Check one): Negative ☐ Positive ☒

Negative = no cultural resource sites were discovered or reported on.

Positive = new sites were discovered or known sites were visited and reported.

Note: Alaska Heritage Resources Survey (AHRs) numbers are **required** for reported cultural resource sites, including buildings. (Assigning an AHRs number is critical for record keeping and does not indicate whether the site has been evaluated for its historic significance. AHRs numbers can be obtained by contacting Joan Dale at 907-269-8718).

**Project/Report Information:**

- Report Title: USAG FWA Projects: The Unmanned Aerial Vehicle (UAV) Corridor Development, Digital Multipurpose Training Range (DMPTR) Airspace Expansion, and Battle Area Complex (BAX) Airspace and Footprint Expansion
- Report Author(s): Julie Esdale
- Report Date: February 2, 2012
- Submitting Organization/Agency: U.S. Army Garrison Fort Wainwright, Department of Public Works
- Project Name and Project Number: The Unmanned Aerial Vehicle (UAV) Corridor Development, Digital Multipurpose Training Range (DMPTR) Airspace Expansion, and Battle Area Complex (BAX) Airspace and Footprint Expansion
- Principal Investigator (PI) name: Julie Esdale

**Geographic Information (attach an extra sheet or cite report page numbers if necessary)**

- USGS 1:250,000 Quadrangle(s): Fairbanks, Big Delta, Mount Hayes
- USGS 1:63,360 Mapsheet(s): Fairbanks B1-B4, C1-C4, D1-D4, Big Delta A4-A6, C5-C6, D5-D6, Mount Hayes D3-D6, C4-C5.
- Meridian/Township / Range / Section (MTRS) location: (all affected sections)  
Format example: "F021N018E|13-14" See attached maps
- Verbal description of survey area  
(for example: "123 Acme Street," "confluence of Fish and Moose creeks," "Milepost 9-16 of the Smithville Highway")  
FWA Cantonment, Tanana Flats Training Area, Yukon Training Area, and Donnelly Training Area

- Does this report contain boundary coordinates for the survey area? Yes ☐ No ☒ Page #(s) \_\_\_\_\_
- Does this report contain boundary coordinates for reported sites? Yes ☐ No ☒ Page #(s) \_\_\_\_\_
- Land owner(s): U.S. Army Garrison Fort Wainwright
- Answer one: Acres Surveyed n/a Hectares Surveyed \_\_\_\_\_

**Cultural Resources Management (CRM) Information**

- List AHRs numbers of all investigated or described sites – both within and outside the survey area (attach an extra page if necessary): XMH-00274, 322, 323, 902, 903, 1071, 1333, 1360, 1364, 1365, 1366, 1369, 1377, and 1378
- Is the report part of a National Historic Preservation Act - Section 106 consultation? Yes ☒ No ☐
- Is the report part of an Alaska Historic Preservation Act compliance consultation? Yes ☐ No ☒
- Does the report's data support a submitting agency's determination of eligibility or effect? Yes ☐ No ☒
- Was this report submitted to fulfill State Field Archaeology Permit requirements? Yes ☐ No ☒  
Permit No.: \_\_\_\_\_



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, U.S. ARMY GARRISON FORT WAINWRIGHT  
1060 GAFFNEY ROAD #6000  
FORT WAINWRIGHT, ALASKA 99703-6000

REPLY TO  
ATTENTION OF:

Directorate of Public Works

FEB 07 2012

SUBJECT: The Unmanned Aerial Vehicle (UAV) Corridor Development, Digital Multipurpose Training Range (DMPTR) Airspace Expansion, and Battle Area Complex (BAX) Airspace and Footprint Expansion

Judith E. Bittner  
State Historic Preservation Officer  
Office of History and Archaeology  
550 West Seventh Avenue, Suite 1310  
Anchorage, Alaska 99501-1365

Dear Ms. Bittner:

The US Army Garrison Fort Wainwright, Alaska (USAG FWA) has proposed three separate Joint Pacific Alaska Range Complex (JPARC) Army-related undertakings.

**Project 1: UAV Corridor Development** - The USAG FWA proposes to establish new restricted airspaces connecting army training areas for UAV's. This undertaking will not require any ground disturbance.

**Project 2: DMPTR Airspace Expansion** - The USAG FWA proposes to establish a restricted air space over the DMPTR in the Yukon Training Area (YTA) to provide better support for Joint Combined Arms Live Fire training (JCALF). The changes in the restricted airspace have no ground effects.

**Project 3: BAX Airspace and Footprint Expansion** - The USAG FWA proposes to establish a restricted air space over the BAX in Donnelly Training Area (DTA) east to provide better support for JCALF. The changes in the restricted airspace will require a change in the ground footprint of the BAX Surface Danger Zone.

Section 106 of the National Historic Preservation Act (NHPA) (16 USC § 470, as amended 2000) reviews of these current projects were conducted in January 2012. No historic properties will be affected by the undertakings related to Projects 1 and 2. Application of the Criteria for Adverse Effect [36 CFR 800.5(a)] indicates a finding of "No Historic Properties Adversely Affected" for the UAV Corridor Development and the DMPTR Airspace Expansion. Archaeological sites will be affected by the BAX Airspace and Footprint Expansion undertaking,



in particular, the change in the BAX Surface Danger Zone's ground footprint. Application of the Criteria for Adverse Effect [36 CFR 800.5(a)] indicates a finding of "Historic Properties Adversely Affected" for this project based on the findings outlined below. USAG FWA requests your concurrence with these findings.

#### **Project Setting and Environment**

The three proposed projects are located in and around Fort Wainwright's cantonment, YTA, DTA, and Tanana Flats Training Area (TFTA) (Figure 1).

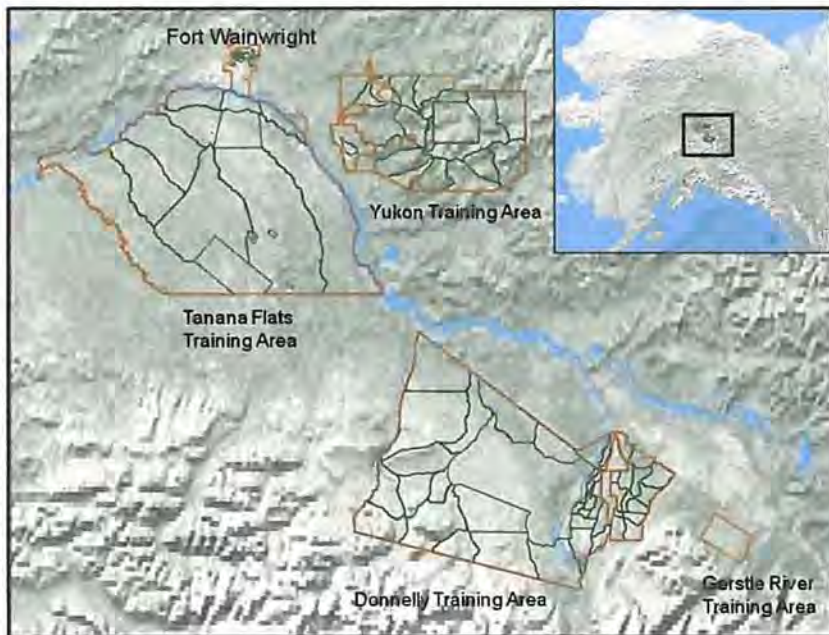


Figure 1. Location of USAG FWA and training areas in central Alaska.

The geology of Fairbanks, Alaska and the surrounding area is characterized by round even-topped, northeast to east trending ridges that rise above adjacent valley floors to an elevation of 450-915 meters above sea level (masl). Bedrock is primarily composed of Precambrian Birch Creek schist with few areas of igneous intrusions, granite and quartz diorite. Most of the area is covered by a thin (1-200 cm) mantle of micaceous aeolian silt (loess) derived from outwash plains south of the Tanana River (Muhs and Budahn 2006). Soils are typically well-drained brown silt loam associated with poorly drained silt loams in depressions and drainages (Natural Cooperative Soil Survey 1999).

Near Delta Junction and the DTA, Precambrian schist's are overlain by Cretaceous granites and Tertiary volcanic rocks. Bedrock is covered with glacial and alluvial deposits. Moraine and outwash fans are among the most common surface sediments (Holmes 1965).

### **Prehistoric Context**

Interior Alaska has been continuously inhabited for the last 14,000 years and evidence of this continuum of human activity has been preserved within and around Fort Wainwright's training lands. Interior Alaska's ice-free status during the last glacial period provided a corridor connecting the Bering Land Bridge and eastern Asia to North America. This allowed small bands of nomadic peoples to colonize Alaska and the rest of the continent and began a period of habitation in Interior Alaska that has persisted through the entire Holocene, the arrival of European traders in the late 1810s, the Klondike gold rush of the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, and the military development of the Interior during the middle of the 20<sup>th</sup> century. Fort Wainwright cantonment and training lands comprise a vast and still relatively un-surveyed region with areas of high potential for yielding evidence of this activity.

Alaska has long been regarded as the gateway to the Americas and has held archaeological interest as the possible location for the oldest archaeological sites in the New World. This is due to more than Alaska's proximity to Asia and ice-free condition at the end of the Pleistocene. Similarities between archaeological assemblages in Siberia and Alaska and the discovery of lanceolate projectile points in the muck deposits around Fairbanks in the early 1900s (which bore a resemblance to Clovis points of some antiquity in the American southwest) also sparked interest in Alaska as a source area for all Native Americans.

After initial colonization, archaeologists generally divide Interior Alaska's prehistory into three broad archaeological themes: the Paleoarctic Tradition (12,000-6,000 years ago<sup>1</sup>), the Northern Archaic Tradition (6,000-1,000 years ago), and the Athabaskan Tradition (1,300-800 years ago) (Potter 2008.) Archeological materials from these cultures are generally limited to lithic artifacts such as projectile points, cutting tools, scrapers, waste flakes from tool manufacturing, faunal remains, and hearths.

Reconstructions of paleoecological evidence suggest that the end of the Pleistocene was marked by a warming trend in Interior Alaska that may have contributed to initial colonization of the area (Bigelow and Powers 2001). Several sites in areas surrounding Army lands demonstrate that people began living in Interior Alaska 14,000 years ago. Significant sites in the Tanana Valley dating between 14,000-12,000 years ago include Healy Lake (Bigelow and Powers 2001), Walker Road (Bigelow and Powers 2001), Swan Point (Bigelow and Powers 2001), Mead (Bigelow and Powers 2001), and Broken Mammoth

<sup>1</sup> All dates are given in calendar years before present.

(Bigelow and Powers 2001). There are no sites in Alaska, however, that predate the oldest sites in the contiguous United States, nor do Alaska's oldest sites resemble the Clovis culture (Bigelow and Powers 2001). This makes Alaska's earliest inhabitants questionable ancestors to all Native Americans despite genetic evidence pointing to a north-central Asian homeland (Eshleman et al. 2003). The Younger Dryas cooling event from 13,000-12,000 years ago (Bigelow and Powers 2001) may have led to a temporary population decline (Potter 2008) in the Interior before permanent colonization.

The Paleoarctic Tradition is a term is now generally used by archaeologists to refer to the earliest settled people known from all over Alaska. It was originally defined by Anderson<sup>2</sup> (Anderson 1968, 1970) as the earliest microblade-using tradition in the American arctic, with a proposed relationship to Northeast Asian late Pleistocene cultures based on similarities in these distinctive artifact types. Archaeological evidence indicates that early settlers camped on terraces, lakeshores, buttes, and bluffs. By using these locations on high ground, they could locate and track prey that included large mammals such as mammoth and bison. Evidence from the Upward Sun River Site, located just 5km southeast of TFTA, for example, demonstrates that hunter-gatherers in Interior Alaska were concentrating on bison and wapiti at the end of the Pleistocene (The Upward Sun River Site is also known for one of the earliest burials in the Americas. (Potter 2008; Potter et al. 2008; Potter et al. 2011)). It is likely that the treeless environment and nomadic nature of these peoples had a direct impact on the kinds of tools they fashioned. Stone, bone, antler, and ivory provided the most abundant material for manufacturing weapons and cutting tools. Artifacts typically associated with this culture include small stone microblades, microblade cores, bifacial projectile points, and unifacial scraping tools.

In Interior Alaska, this tradition historically included two cultural divisions called the Nenana and Denali complexes. The Nenana Complex was identified by Powers and Hoffecker from sites in the Nenana Valley (Powers and Hoffecker 1989). This complex began approximately 11,000 years ago with an artifact assemblage that included triangular or teardrop-shaped, bifacially worked, projectile points ("Chindadn" points (Cook 1969; 1975; Holmes and Cook 1999)), large unifacial chopper-like tools, and flake tools. The Nenana Complex is defined as lacking microblades, microblade cores and burins and was proposed to predate the microblade-rich Denali Complex. Many Nenana Complex archaeological sites are located in the Tanana Valley, adjacent to Fort Wainwright training lands (Broken Mammoth (Holmes 1996; Yesner et al. 1999), Chugwater (Lively 1996), Donnelly Ridge (West 1967; 1996, Donnelly Ridge is located in DTA), Healy Lake (Cook 1989), Mead (Holmes 2007) and Swan Point (Holmes et al. 1996; Holmes 1998; 2007)).

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<sup>2</sup> Anderson called it the "American Palaeoarctic Tradition" but most researchers use the shortened version.



The Denali Complex, dated roughly to 10,500 to 8,000 years ago, was originally defined by West (West 1967; 1975) and includes distinctive wedge-shaped microblade cores, core tablets and their derivative microblades, large blades, biconvex bifacial knives, certain end-scrapers, and burins. West later defined the Denali Complex as a regional variant of the American Paleoarctic Tradition (West 1981). Denali sites in the vicinity of Fort Wainwright training lands include Mt. Hayes (West 1996), Swan Point (Holmes et al. 1996; Holmes 1998; 2007), and Gerstle River (Potter 2001). At least one site in the TFTA (XMH-2043) has also been dated to this period.

The relationship between the proposed Nenana and Denali complexes is as of yet unresolved. As discussed above, some researchers view the Nenana Complex as a bifacial industry that predates the microblade-based Denali Complex. However, current research at sites such as Swan Point and Broken Mammoth indicates that microblades and burins were used by the earliest known cultures in Interior Alaska, with a later co-occurrence with Chindadn points—the defining artifact type of the Nenana complex. Although some archaeologists still believe that there is a cultural distinction between the Nenana and Denali complexes (e.g. Dumond 2001), the general understanding from Interior Alaskan archaeologists is that there is a behavioral explanation for the presence or absence of microblades in different assemblages (Holmes 2001; Potter 2008; Yesner and Pearson 2002). Moreover, both Nenana and Denali technology persist in central Alaska throughout the Holocene (Bever 2006).

Site density declined in the areas around Fort Wainwright in the early Holocene, suggesting a slight depopulation during a period of climate change which initiated the widespread establishment of spruce forests (Potter 2008). The boreal forest in Interior Alaska was established by 8000 years ago (Bigelow and Powers 2001). Sites from this time period are less well publicized than the older sites, but include Houdini Creek (circa 8600 years old), Hurricane Bluff (c. 9800 years old), Lucky Strike (c. 8500 years old), Gerstle River (c. 10,000 years old), and the Campus Site (c. 7700 years old) (Pearson and Powers 2001, Potter et al. 2007, Potter 2008). Bison, wapiti, and birds were the most important subsistence game during this period (Potter 2007; Potter 2008).

Site density increased again after about 6000 years ago in Interior Alaska (Potter 2008). This population increase coincides roughly with the Northern Archaic tradition and the appearance of side-notched projectile points. Anderson originally defined the Northern Archaic tradition to specifically address notched point bearing stratigraphic horizons that did not contain microblades at the Onion Portage site in northern Alaska (Anderson 1968). Alaskan notched points were generally similar to Archaic-age dart points in the contiguous United States. Time has shown middle Holocene assemblages in Alaska to be quite diverse, however, and it is questionable whether this trait is related to southern forms or if it is a reliable indicator of cultural affiliation (Clark 1992; Cook and Gillespie 1986). Artifact assemblages associated with this culture can vary but generally

contain myriad tools ranging from bifacial knives and microblades to end scrapers and side-notched points. Middle Holocene hunter-gatherers had a subsistence economy focused on seasonally abundant game including caribou, fish, and as moose (Potter 2008). Notched point assemblages occur in many sites in interior Alaska including over one dozen on Army lands (XBD-277, XMH-277, XMH-283, XMH-303, XMH-309, XMH-874, XMH-950, XMH-1130, XMH-1168, XMH-1300, Robertson et al. 2004; Raymond-Yakoubian and Robertson 2005.) Several sites (XBD-270, XMH-915, XMH-925), including the excavated Banjo Lake site in DTA (XMH-874) have also produced middle Holocene dates from hearth charcoal. The 6300-6700 year old dates from Banjo Lake were also associated with a microblade component (Robertson et al. 2008).

Utilization of microblade and burin-based industries appears to continue through the middle and late Holocene in interior Alaska (Esdale 2008; Potter 2004). By the late Holocene, archaeologists see a shift from seasonal large mammal hunting with a nomadic lifestyle to a focus on seasonally overabundant resources, use of storage, and more permanent settlements (Potter 2008b). Artifact assemblages do not drastically change until the last millennium of the Holocene when microblades disappear from the archaeological record (Potter 2008).

Linguistic evidence suggests that the Athabaskan culture may have appeared in the Tanana Valley as early as 2,500 years ago. Through ethnography, oral history, and a broad array of cultural items, much has been learned about Athabaskan culture and history in the region. Artifacts associated the Athabaskan culture are exceptionally diverse and include bone and antler projectile points, fishhooks, beads, buttons, birch bark trays, and bone gaming pieces. In the Upper Tanana region copper was available and was used in addition to the traditional material types to manufacture tools such as knives, projectile points, awls, ornaments, and axes (Clark 1981). A late prehistoric Athabaskan occupation is recognized at several sites in and around Fort Wainwright's training lands (Andrews 1975; Andrews 1987; Cook 1989; Mishler 1986; Sheppard et al. 1991; Shinkwin 1979; Yarborough 1978). Of particular interest in this regard is a copper projectile point recently found in a buried context at DTA (XBD-272) (Robertson, et al. 2009).

The Athabaskan Tradition includes late prehistoric and proto-historic cultures generally believed to be the ancestors of Athabaskan tribes who currently inhabit Interior Alaska. Excavated Athabaskan sites are rare, but the limited body of evidence allows for several generalizations. Raw material usage was reorganized in the Athabaskan Tradition which de-emphasizing stone tool making and increasing the emphasis on the manufacture of items from native copper and organic materials (Dixon 1985). Assemblages include ground and pecked stone artifacts and an increased use of expedient tools. There was a broadening and diversification of the resource base at this time to include small mammal and freshwater marine animals such as fish and mollusks (McFadyen

Clark 1981; McFadyen Clark 1996; Ream 1986; Sheppard et al. 1991; Shinkwin 1979). Athabaskan sites tend to occur in resource-rich areas near lakes, streams and rivers, and are generally characterized by large house pit and cache pit features. Proto-historic Athabaskan assemblages include Euro-American trade goods such as glass beads and iron implements. Sites of this time period reflect an increased reliance on outside trade and include log cabins co-occurring with traditional house pits, as well as a change in site location to maximize trading opportunities (Andrews 1975; Andrews 1977; Andrews 1987; McFadyen Clark 1981; VanStone and Goddard 1981).

Athabaskan settlement patterns depended greatly on the availability of subsistence resources, and Interior bands lived a nomadic lifestyle. They often traversed vast areas to support themselves and spent considerable time engaged in subsistence activities. It was often necessary for bands to divide into smaller groups to find game, and preserved fish were used as a staple of the diet in addition to fresh game (Andrews. 1975).

Four Athabaskan linguistic and geographic groups have inhabited the Tanana Valley; the Upper Tanana, Tanacross, Tanana and Koyukon. Each group is further distinguished according to geographic location. Bands of the Tanana and Tanacross groups are historically associated with the geographic area that embodies Forts Wainwright and Greely. Salcha, Chena, Wood River, Goodpaster, and Healy Lake bands have inhabited the region since protohistoric times and possibly even prehistoric times (Andrews 1975). Use of the region varied from one band to the next. The Salcha, Chena, Goodpaster, and Wood River bands of the Tanana Athabascans and the Healy Lake band of the Tanacross Athabascans used certain parts of what are now Fort Wainwright and Fort Greely (McKenna 1981). Several villages have been reported on or near Fort Wainwright. One occupied by the Wood River band is said to have been located in the southern part of Fort Wainwright but has not been found (Dixon 1980; Reynolds 1986). The Blair Lakes Archaeological District (FAI-335) on USAG FWA may relate to the prehistory of the Athabaskan tradition. Euro-American historic archaeological sites are also present (Gamza 1995; Phillips 1984).

### **Historic Context**

With the beginning of Euro-American contact in Interior Alaska in the early 19<sup>th</sup> century, trade influences and influxes of new populations began to change life in the region. Land use patterns shifted from traditional indigenous uses to activities based on Euro-American economic and political systems. Fort Wainwright training lands fall within an area occupied at the time of Euro-American contact by Lower-Middle Tanana Athabascans, including 'bands' described generally as the Salcha, Big Delta-Goodpaster, Wood River, and Chena bands (McKenna 1981; Andrews 1975; Mishler 1986). Historical accounts document traditional settlement patterns that were focused on a widely

mobile season round, with the fall caribou hunt playing a pivotal role in subsistence preparations for the winter and summer activities focused at fish camps, berry and root collecting and in sheep hunting. These activities were frequently communal, with several local bands connected by common interest, geography and intermarriage. Despite anthropological attempts to define boundaries for the peoples living in the lower Tanana River valley, natural terrain served as the only definable boundary to settlement patterns (McKenna 1981).

As Euro-American traders, miners, missionaries and explorers moved into the Tanana River valley, the traditional life ways of local Athabaskan groups were disrupted. Access to trade goods and the development of the fur trade not only affected traditional material culture, but also began to dramatically affect subsistence activities and settlement patterns. Similarly, the arrival of missionaries in the Alaskan interior profoundly influenced traditional social organization. The introduction of mission schools for Native children and the doctrine of new religious beliefs contributed to an erosion of traditional practices (McKenna 1981).

Russian fur traders began settling Interior Alaska starting in the 1810s, establishing a post at Nulato on the Yukon River and one at Taral on the Copper River. British traders established Fort Yukon in 1847. Trade goods from these posts may have passed to Tanana Athabascans and Upper Tanana Athabascans through intra-Native trade networks. Direct contact between Tanana Athabascans and white traders increased after the 1860s. With the U.S. purchase of Alaska in 1867, control of trading stations and the fur trade passed to Americans. Through the 1880s, American traders established several additional posts on the Yukon and Tanana Rivers, including locations at Nuklukayet (modern day Tanana), Belle Isle (modern day Eagle), and Fort Yukon.

Trade goods introduced by Euro-American settlers influenced the Native lifestyle. Clothing, staples, tools, and other necessities could be obtained through trade. Guns allowed hunters to obtain game with greater efficiency. Gradually, Athabaskan Native groups began to alter their traditional nomadic patterns in favor of more permanent settlements. However, while significant, this contact would not have as dramatic an impact on the region as the discovery of gold in the Interior during the last decades of the 19<sup>th</sup> century. The towns established by Euro-American settlers at the turn of the 20<sup>th</sup> century, in response to the Klondike Gold Rush and the eventual military development of the region, would rapidly and permanently change the demography and economy of Interior Alaska.

Gold strikes in the Forty mile River region, Birch Creek area, and the Canadian Klondike began drawing miners and prospectors north in the 1880s and 1890s. In response to this gold rush, E.T. Barnette established a trading post on the Chena River in 1901. The following year, prospector Felix Pedro

discovered gold nearby and a new gold rush soon led to the founding of Fairbanks at the site of Barnette's original trading post. Most mining activities in the region occurred on creeks north of Fairbanks with the town serving as a supply center. Agricultural and other commercial activities, such as lumber, also developed to support mining activities in the Fairbanks area. Homesteads existed on parts of what is today the main post of Fort Wainwright as early as 1904.

In 1898, the discovery of gold in the Tanana uplands began a rush of Euro-American settlement into the Tanana River valley. As the economic importance of the Tanana Valley increased, the need for reliable transportation routes and communication systems rose in tandem. Existing trails, such as the Bonnifield, Donnelly-Washburn and Valdez-Fairbanks trails, saw increased use and development in the first decade of the 20<sup>th</sup> century. This increase in activity also resulted in the establishment of several roadhouses and posts. In 1906, Congressional appropriations led to improvement of the Valdez-Fairbanks trail, crossing the Alaska Range south of Delta Junction, following the Tanana River to Fairbanks. Completion of the Alaska Railroad in 1923 was followed two decades later by construction of the Alaska Highway in 1942, firmly tying the Alaskan interior to the outside.

As Fairbanks grew in the first decade of the 20<sup>th</sup> century, several agricultural homesteads were developed on lands now encompassed by sections of the Fort Wainwright cantonment area. These homesteads provided Fairbanks with a variety of agricultural products and wood for fuel, but were subsumed when lands were withdrawn for the creation of Ladd Field, which later became Fort Wainwright (Price 2002.)

Riverboats were the primary means of getting people and supplies into the Interior at the turn of the 20<sup>th</sup> century. The Fairbanks town site was located at the upper limit of navigation for stern-wheeler riverboats on the Chena River. Upriver from that point, residents navigated the river using shallow-draft boats in summer and sleds in the winter. As commerce in the area increased, roads and trails were constructed, sometimes following earlier indigenous routes. The major overland route to tidewater was the Valdez-Fairbanks Trail, which began as a military trail from Valdez to Eagle in 1899.

Transportation and communication networks including the Alaska Railroad were developed to serve new settlements in Interior Alaska. A branch of the railroad route was extended to Fairbanks in 1904. Roadhouses along the route catered to travelers (However, roadhouses were located out on what are now Fort Wainwright training lands. One property was on the Bonnifield Trail in the TFTA while two roadhouses and a seasonal tent operation existed along the Donnelly-Washburn Trail in the current Donnelly Training Area). Secondary routes connected Fairbanks to the surrounding mining districts.