

**Appendix N**  
**Draft EIS Comments and Responses**

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## TABLE OF CONTENTS

	<u>Page</u>
APPENDIX N DRAFT EIS COMMENTS AND RESPONSES .....	N-1
N.1 PUBLIC AND AGENCY COMMENT SUMMARY .....	N-1
N.1.1 Public/Agency Comment Identification Guide .....	N-3
N.1.1.1 Comment Receipt and Review .....	N-3
N.1.1.2 Locating Comments .....	N-4
N.1.1.3 Locating Responses to Comments .....	N-4
N.2 PUBLIC AND AGENCY COMMENTS .....	N-11
N.2.1 Government Comments in Order by Identifier ID Number .....	N-12
N.2.2 Tribal Comments in Order by Identifier ID Number .....	N-173
N.2.3 Non-government Comments in Order by Identifier ID Number .....	N-175
N.2.4 Individual Comments in Order by Identifier ID Number .....	N-340
N.3 GOVERNMENT RESPONSES TO COMMENTS .....	N-652

## LIST OF TABLES

	<u>Page</u>
Table N-1. Summary of Comment Submittal Source .....	N-1
Table N-2. Summary of Comment Submittal Format .....	N-1
Table N-3. Response Code Guide for Response to Comments on Draft EIS .....	N-2
Table N-4. Directory of Comments .....	N-4
Table N-5. Government Responses to Comments .....	N-652

## **ACRONYMS AND ABBREVIATIONS**

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

## APPENDIX N DRAFT EIS COMMENTS AND RESPONSES

### N.1 PUBLIC AND AGENCY COMMENT SUMMARY

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

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

**Table N-1. Summary of Comment Submittal Source**

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

**Table N-2. Summary of Comment Submittal Format**

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

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

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

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

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

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

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

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

### **N.1.1 Public/Agency Comment Identification Guide**

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

#### **N.1.1.1 Comment Receipt and Review**

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

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

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

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

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

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

### **N.1.1.2 Locating Comments**

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

### **N.1.1.3 Locating Responses to Comments**

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

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

**Table N-4. Directory of Comments**

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



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

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

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

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

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

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

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

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

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

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

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

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

## **N.2 PUBLIC AND AGENCY COMMENTS**

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

## N.2.1 Government Comments in Order by Identifier ID Number

**G0001**

[REDACTED]

---

**From:** Emerson Krueger [REDACTED]  
**Sent:** Friday, April 27, 2012 12:15 PM  
**To:** ALCOM J08 Admin Box  
**Cc:** Warren Keogh; John Moosey; Eileen Probasco  
**Subject:** Joint Pacific Alaska Range Complex EIS  
**Attachments:** MSB\_JPARC\_EIS\_comments\_27Apr12.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Day,

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

A paper copy was put in the mail today.

I was unable to submit the comment via the website.

v/r

Emerson Krueger  
Planner  
Matanuska-Susitna Borough  
[REDACTED]



**G0001**



**MATANUSKA-SUSITNA BOROUGH**

**Planning and Land Use Department**

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 745-9833 • Fax (907) 745-9876

Email: [planning@matsugov.us](mailto:planning@matsugov.us)

April 26, 2012

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

Re: JPARC DRAFT EIS Initial Comments

Dear Sir or Madam,

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

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

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

Many Chapter 3 tables list three Fox 3 proposal areas:

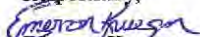
- 1 = Existing Fox 3 MOA
- 2 = Fox 3 MOA Alternative A and B
- 3 = Fox 3 MOA Alternative A

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

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

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

Respectfully,

  
Emerson Krueger  
Planner

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

**G0002**

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

Lt. Gen Hoog,

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

Thank you ,  
Luke Hopkins  
Mayor  
Fairbanks North Star Borough

**G0002**



April 24, 2012

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

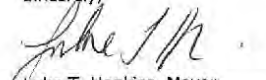
Dear Sir,

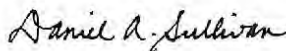
The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent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

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

Thank you in advance.

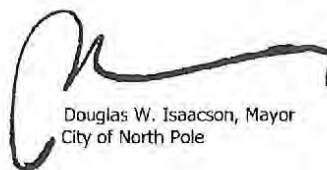
Sincerely,

  
Luke T. Hopkins, Mayor  
Fairbanks North Star Borough



Dan Sullivan, Mayor  
City of Anchorage

  
Jerry Cleworth, Mayor  
City of Fairbanks

  
Douglas W. Isaacson, Mayor  
City of North Pole

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

G0003

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

Written Comment Form

For more information and to submit comments online, please go to:  
[www.jpisceis.com](http://www.jpisceis.com)

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

Name (First and Last): KRISTOPHER RUPPEL Date: 5-23-12

Title: Mayor

Organization: CITY OF WASILLA

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

Comment submitted on behalf of (choose one):

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

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

Comment Topic(s):

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

Resource Areas:

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

Proposed Actions:

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

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;

Fax: 907-552-5411; Email: [alcom.j08@elmendorf.af.mil](mailto:alcom.j08@elmendorf.af.mil)



**G0003**

Comment(s):

1. CAGI, Too Much + other Wildlife Impacts?
2. TROOP MOVEMENT THROUGHOUT AREA IN FUTURE –  
WILL IT HAPPEN? THEN WHAT RESTRICTIONS  
ARE IN PLACE?
3. WHAT CHANGES TO THE CURRENT PLAN  
ARE EXPECTED WITHIN THE NEXT  
30 YEARS??
- IF YOU DON'T HAVE A PLAN FOR  
THE FUTURE IN LIGHT OF THE EVER  
CHANGING TRAINING NEEDS + EQUIPMENT –  
AND POTENTIAL CIPER WHY NOT?  
AND SUPPOSING YOU DO – THEN DISCLOSE  
THE POSSIBLE SCENARIOS –

Use additional sheets as needed.

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

Thank you for your input.

**G0004**

[REDACTED]

21 COLONEL ORR: All right. Our next speaker is Mr. Luke  
22 Hopkins.  
23 MR. HOPKINS: Yes, thank you. Luke Hopkins, Fairbanks  
24 North Star Borough, the Mayor. So I will be submitting written  
25 comments that would be much more extensive. I don't have those

[REDACTED]

**G0004**

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

■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

■ [REDACTED]

**G0005**

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



**Governor Sean Parnell**  
STATE OF ALASKA

550 West Seventh Avenue, Suite 1700  
Anchorage, AK 99501  
907-269-7450  
fax 907-269-7461  
[www.Gov.Alaska.Gov](http://www.Gov.Alaska.Gov)  
[Governor@Alaska.Gov](mailto:Governor@Alaska.Gov)

May 24, 2012

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

To Whom It May Concern,

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

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

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

Regards,

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

Sean Parnell  
Governor



**G0006**

[REDACTED]

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


[REDACTED]

**G0006**

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

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

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



**G0006**

1 and take a good long look at that.

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

11 COLONEL ORR: Thank you.

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

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

16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]  
29 [REDACTED]  
30 [REDACTED]

[REDACTED]

E

**G0007**

[REDACTED]

17 COLONEL ORR: Thank you. Our next speaker is Ms. Mary  
18 Leith is it?  
19 MS. LEITH: Leith.  
20 COLONEL ORR: Leith. All right. Thank you.  
21 MS. LEITH: I'm Mary Leith, Mayor of the city of Delta  
22 Junction. And the city of Delta Junction wants to state that we  
23 made a memorandum of agreement with the Army in '06 and upon  
24 investigation it was essentially omitted from the full JPARC  
25 Draft EIS and as a result we feel the EIS is -- the Draft EIS is

[REDACTED]


**G0007**

1 defective.

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

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

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





**G0007**

1 addressed in the Draft EIS.

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

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

[illegible]

**G0008**



April 24, 2012

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

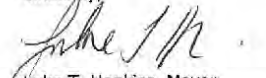
Dear Sir,

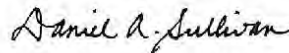
The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent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

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

Thank you in advance.

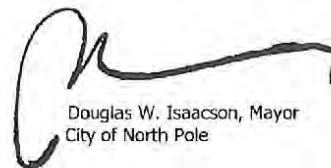
Sincerely,

  
Luke T. Hopkins, Mayor  
Fairbanks North Star Borough



Dan Sullivan, Mayor  
City of Anchorage

  
Jerry Cleworth, Mayor  
City of Fairbanks

  
Douglas W. Isaacson, Mayor  
City of North Pole

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



**G0009**

June 4, 2012

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

Re: JPARC Draft EIS comments

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

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

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


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

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

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

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

Sincerely,

  
Greg Jones  
Executive Director

Alaska Mental Health Trust Land Office

20110604:0000\_0010:1100\_00000000:AK:00000000\_0010:00000000-0000\_0000-0000-000000000000

**G0010**

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

**G0011**

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

**G0012**

From:

06/20/2012 13:46

#068 P.001/002

P.O. Box 490 Healy, Alaska 99743  
Phone: 907 683-1330  
Fax: 907 683-1340  
Email: dbgovt@mtaonline.net

**DENALI BOROUGH**

**Fax**

**To:** ALCOM Public Affairs

**From:** Gail Pieknik, Borough Clerk

**Fax:** (907) 552-5411

**Pages:** 2

**Phone:**

**Date:** 6/20/2012

**Re:** JPARC

**CC:**

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

• **Comments:**

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

**G0012**

From:

06/20/2012 13:47

#068 P.002/002

DENALI BOROUGH, ALASKA  
RESOLUTION NO. 11-05

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

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

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

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

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

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

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

  
MAYOR DAVID M TALERICO

ATTEST:   
GAIL PIEKNIK, BOROUGH CLERK



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

Denali Borough, Alaska

RESOLUTION 11-05

Page 1 of 1



**G0013**

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

**G0013**

As a first step, the list of potentially affected rural communities (as discussed above) could be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding could be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information for the potentially affected rural communities can be incorporated into the subsistence impact analysis. Finally, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations fails to recognize the importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the "high dependence" category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities.

Communities in which 80 percent or more of the households report using subsistence resources should be classified as high dependence regardless of the community's composition. Thank you for the opportunity to comment, and for extending the comment period. If you have questions, you may contact Barbara A. Cellarius, Ph.D., Cultural Anthropologist/Subsistence Specialist, Wrangell-St. Elias National Park and Preserve, P.O. Box 439, Copper Center, AK 99573-0439, Tel: 907 822 7236, Fax: 907 822 7216, Email: [barbara\\_cellarius@nps.gov](mailto:barbara_cellarius@nps.gov), for further information. Sincerely /s/ Paul Hunter for Joan Darnell, Team Manager Environmental Planning and Compliance

G0013

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[REDACTED]

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

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



**G0014**

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF MINING, LAND AND WATER

SEAN PARNELL, GOVERNOR

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

July 5, 2012

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

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

Dear Sir:

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

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

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

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

**G0014**

July 5, 2012  
Page 2 of 4

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

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

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

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



**G0014**

July 5, 2012  
Page 3 of 4

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

**G0014**

July 5, 2012  
Page 4 of 4

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

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

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

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

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

**G0015**

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**From:** Mutter, Doug [REDACTED]  
**Sent:** Thursday, June 28, 2012 4:37 PM  
**To:** ALCOM J08 Admin Box  
**Cc:** Bergmann, Pamela  
**Subject:** Joint Pacific Alaska Range Complex EIS Comment Submission  
**Attachments:** ER12\_235\_JPARC\_DEIS\_DOI\_comments.pdf

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

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

[REDACTED]







## United States Department of the Interior

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

9043.1  
PEP/ANC  
ER 12/235

June 28, 2012

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

Dear Lieutenant General Hoog:

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

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

### Threatened and Endangered Species

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

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

**G0015**

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

#### Migratory Birds and Bald and Golden Eagles

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

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

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



**G0015**

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

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

#### Recreation Resources and Activities

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

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



**G0015**

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

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

#### Wildland Fire Management

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

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

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

**G0015**

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

Sincerely,



Pamela Bergmann  
Regional Environmental Officer - Alaska

Attachments

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

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

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

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

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

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

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



**G0015**

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

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

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

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

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

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

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

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

**G0015**

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

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

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

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

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

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

**G0015**

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

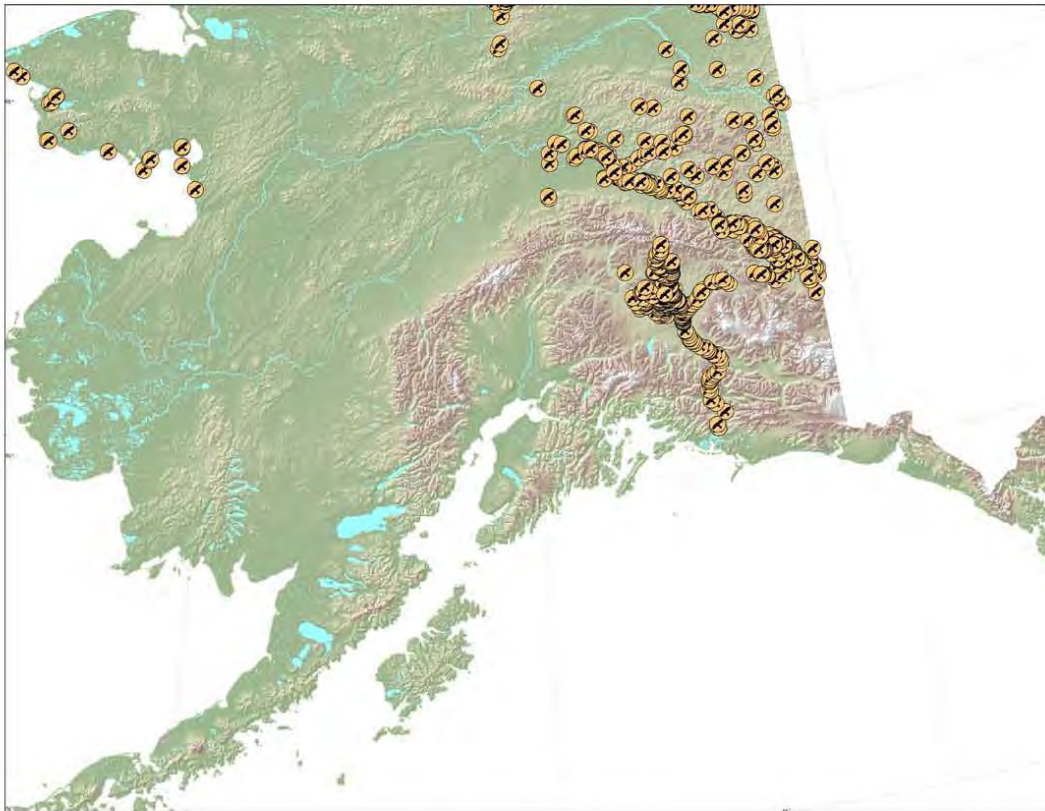
Page K-25, Table K-2 Proposed Mitigations: Because of the importance of reducing or eliminating the potential to ignite wildfires on BLM (and other) lands within these MOAs, we support the mitigations for the release of flares and chaff in the Fox 3 and Paxson MOAs, and recommend specifying in the Final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



**G0015**

**Attachment 2**

**Map of Historic Eagle Nest Locations**



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



**G0015**

### **Attachment 3**

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**G0016**



## CITY OF NORTH POLE

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

Dear Sir,

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

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

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

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

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

**G0016**

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

#### **Review and Comments from the CONP on the Draft JPARC EIS**

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

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

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

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

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

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



G0016

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

(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,

(b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.

Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.

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

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

#### **IFR Access to MOA airspace**

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

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

**G0016**

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

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

***Proposed Realistic Live Ordnance Delivery in proposed restricted area***

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

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

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

***Proposed Battle Area Complex Restricted Area***

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

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

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

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

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

***Proposed Night Joint Training in all military special use airspace***

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



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

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

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

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

***Proposed Enhanced Access to Ground Maneuver Space Areas***

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

***Proposed Tanana Flats Training Area Access Road***

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

***Proposed Joint Air-Ground Integration Complex***

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

***Proposed Intermediate Staging Bases***

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

**G0016**

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

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

***Proposed Joint Precision Airdrop System***

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

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

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

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

The following concerns arise based on the proposed airspace expansions:

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

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

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

The following considerations arise concerning estimated cost savings:

CONP JPARC EIS RESPONSE

6

**G0016**

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

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

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

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

#### Expanded Data Points

##### Airspace Expansions:

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

CONP JPARC EIS RESPONSE

7



**G0016**

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

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

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

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

Environmental Study:

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

G0016

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

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

**G0016**

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

**Cost savings:**

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

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

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



**G0016**

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

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

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

Sincerely,



Douglas W. Isaacson  
Mayor

References:

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- ALCOM (Alaskan Command). 2012. Joint Pacific Alaska Range Complex Environmental Impact Statement, Joint Base Elmendorf Richardson, Alaska. March.
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**G0017**



## **Fairbanks North Star Borough**

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

Dear Sir,

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

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

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

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

### **Review and Comments from the FNSB on the Draft JPARC EIS**

**G0017**

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

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

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

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

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

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

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

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

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



**G0017**

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

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

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

**IFR Access to MOA airspace**

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

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

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

**Proposed Realistic Live Ordnance Delivery in proposed restricted area**

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

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



**G0017**

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

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

***Proposed Battle Area Complex Restricted Area***

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

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

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

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

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

***Proposed Night Joint Training in all military special use airspace***

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

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

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

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

**G0017**

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

***Proposed Enhanced Access to Ground Maneuver Space Areas***

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

***Proposed Tanana Flats Training Area Access Road***

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

***Proposed Joint Air-Ground Integration Complex***

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

***Proposed Intermediate Staging Bases***

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

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

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

***Proposed Joint Precision Airdrop System***

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

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

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



**G0017**

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The following concerns arise based on the proposed airspace expansions:

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

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

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

The following considerations arise concerning estimated cost savings:

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

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

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

**G0017**

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

#### **Expanded Data Points**

##### **Airspace Expansions:**

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

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

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

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



**G0017**

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

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

Environmental Study:

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

**G0017**

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

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

Cost savings:

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

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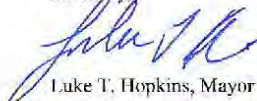
of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1 ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and H0JOE gate.

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

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

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

Sincerely,



Luke T. Hopkins, Mayor

References:

Air Force (U.S. Air Force). 2010. 11th Air Force Airspace Handbook. 29 December.

ALCOM (Alaskan Command). 2012. Joint Pacific Alaska Range Complex Environmental Impact Statement. Joint Base Elmendorf Richardson, Alaska, March.

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**G0018**

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AK DOT&PF, AVIATION

PAGE 01/03



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNEILL

**Department of Transportation and  
Public Facilities**

OFFICE OF THE COMMISSIONER

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July 9, 2012

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

To whom it may concern,

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

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

**Importance of Aviation in Alaska**

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

*"Get Alaska Moving through service and infrastructure."*



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AK DOT&amp;PF, AVIATION

PAGE 02/03

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

#### **Safe Access**

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

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

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

#### **Enhance Communications for Safety**

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

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

#### **Unmanned Aerial Vehicles**

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

**G0018**

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AK DOT&PF, AVIATION

PAGE 03/03

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

**Conclusion**

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

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

Sincerely,



Steven D. Hatter  
Deputy Commissioner - Aviation

**G0019**

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

Dear Sir or Madam -

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

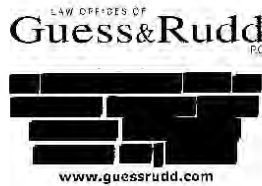
By copy of this email, I am advising Dennis Dunn of the City's comments, insofar as they relate to the City's claim of breach of the 2006 Agreement described in the enclosed letter.

Please contact me if you have questions.

Jim DeWitt, City Attorney  
City of Delta Junction, Alaska

**G0019**

GARY A. ZIPKIN  
LOUIS R. VEERMAN  
JAMES D. LINXWILER  
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MICHAEL S. McLAUGHLIN  
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KRISTIN E. BRYANT



W. EUGENE GUESS 1932-1975  
JOSEPH RUDD 1889-1978  
FRANCIS E. SMITH, JR. 1941-1991

OFFICES IN  
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OF COUNSEL  
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Via U.S. Mail and Email:  
[alcom.j08@elmendorf.af.mil](mailto:alcom.j08@elmendorf.af.mil)

July 06, 2012

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

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

Gentlemen:

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

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

#### I. BACKGROUND

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



**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 2 of 12

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

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

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

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

<sup>1</sup> 2006 SDEIS, Vol. 2, Figure 2.f.

<sup>2</sup> 2006 SDEIS, Vol. 2, Figure 2.e.

**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 3 of 12

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

## **II. COMMENTS**

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

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

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

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

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

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

<sup>3</sup> JPARC DEIS, Vol. 1, p. 1-33.

<sup>4</sup> JPARC DEIS, Vol. 2, p. A-45.

**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 4 of 12

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

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

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

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

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

<sup>6</sup> JPARC DEIS, vol. 1, 3-178 to 220



**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 5 of 12

**B. Comments Relating to Fire Danger.**

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

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

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

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

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

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<sup>7</sup> See 2006 Agreement, pp. 3.4.

<sup>8</sup> Ibid, p. 3.

<sup>9</sup> See, e.g., JPARC DEIS 3-118 to 119.



**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 6 of 12

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

The proposal to increase training activities from 106 days annually to 238 days annually<sup>10</sup> is effectively an impossibility without violating the 2006 Agreement or greatly increasing training activities during the harsh Interior Alaska winter. A 225% increase is not feasible.

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

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

C. Comments Relating to Flooding.

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

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

<sup>10</sup> JPARC DEIS, p. 6.

<sup>11</sup> 2006 Agreement, p. 4; Exhibit A, pp. 2-3.

**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 7 of 12

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

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

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

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

<sup>12</sup> JPARC DEIS, §3.3.6.1 at p. 3-195.

<sup>13</sup> JPARC DEIS, vol. 1, p. 12, Table ES-1.

<sup>14</sup> 2006 Agreement, p. 4.



**G0019**

City of Delta Junction Comments  
 JPARC DEIS  
 July 6, 2012  
 Page 8 of 12

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

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

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

**D. Comments Relating to Public Safety.**

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

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

<sup>16</sup> JPARC DEIS, §3.3.6 at p. 3-195.

**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 9 of 12

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

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

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

**E. Comments Relating to Noise.**

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

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

<sup>17</sup> JPARC DEIS, §3.3.7 at pp. 3-196 to 3-197.



**G0019**

City of Delta Junction Comments  
 JPARC DEIS  
 July 6, 2012  
 Page 10 of 12

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

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

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

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

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

<sup>18</sup> JPARC DEIS, Vol. 2, pp. E-14 to E-15.

<sup>19</sup> JPARC DEIS, Vol. 1, p. 12, Table ES-1.

<sup>20</sup> JPARC DEIS, Vol. 2, pp. E-14 to E-15.

<sup>21</sup> 2006 Agreement, Exhibit A, pp. 5-6.

<sup>22</sup> JPARC DEIS, Vol. 1, pp. 3-187 to 3-188.

**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 11 of 12

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

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

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

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

G. Conclusion.

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

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

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

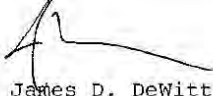
**G0019**

City of Delta Junction Comments  
JPARC DEIS  
July 6, 2012  
Page 12 of 12

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

Sincerely yours.

GUESS & RUDD P.C.



James D. DeWitt

cc: Mary Leith, Mayor  
City of Delta Junction

Mike Tvenge, City Administrator  
City of Delta Junction

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

**G0020**

[REDACTED]

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

Good Afternoon:

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

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

Thank you.

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

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



**G0020**

Sponsored By: Assemblymember Keogh

Amended: 06/28/12

Adopted: 06/28/12

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

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

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

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

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

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

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

**G0020**

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

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

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

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

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

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

**G0020**

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

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

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

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

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

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

**G0020**

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

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

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

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

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

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