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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

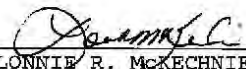
BE IT FURTHER RESOLVED, that the Assembly opposes the establishment of the Paxson MOA between 500 AGL to 14,000 MSL be eliminated due to the importance of the Richardson Highway Corridor.

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

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


LARRY DEVILBISS, Borough Mayor

ATTEST:


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

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

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

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[REDACTED]

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

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

Nathan Bergerbest
Senior Counsel

[REDACTED]

G0021

LISA MURKOWSKI
ALASKA

COMMITTEES:
ENERGY AND NATURAL RESOURCES
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SUBMITTED VIA E-MAIL AND US MAIL

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

COMMENTS ON JPARC DRAFT ENVIRONMENTAL IMPACT STATEMENT

Ladies and Gentlemen:

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

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

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

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MURKOWSKI.SENATE.GOV

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

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

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

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

Respectfully submitted,



Lisa Murkowski
United States Senator

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[REDACTED]

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

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

Brad Palach
[REDACTED]

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
Fish and Game**

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July 9, 2012

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

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

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

The following are the comments of the Department.

Coordination

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

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Administrative Activities Conducted by the Alaska Department of Fish and Game

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

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

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

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

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

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

Nelchina Caribou Herd and Moose Calving

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

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

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

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

Delta Caribou Herd

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

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

Talkeetna Dall Sheep

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

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

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

Delta Bison

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

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

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

Wildlife Mortalities

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

Habitat Enhancement and Stream Crossings

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

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Bears

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

New Public Overflight Restriction Area

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

Harvest of Wildlife for Subsistence and other uses

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

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

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

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

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Also related to subsistence and other uses,

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

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

Safety

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

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

Watana – Susitna hydroelectric Project

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

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

Civilian Airspace Management

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

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

Major Fighting Exercises (MFEs)

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

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

Spelling

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

Page Specific Comments

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

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

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

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

Mid summer: Dall sheep surveys*

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October 1-10: Caribou composition survey*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

All alternatives:

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

Appendix I

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

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

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

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

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

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

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

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

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

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

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

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Appendix K, Mitigation Measures

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,


Craig L. Fleener
Deputy Commissioner

G0022

[REDACTED]

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

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

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

If you need additional information, please contact me.

Thank you

Brad Palach

G0022

Alaska Department of Fish and Game

(907) 267-2145

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

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

Brad Palach

333 Raspberry Rd

Anchorage, AK 99516

Alaska Department of Fish and Game

(907)267-2145

Brad.palach@alaska.gov

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
Fish and Game**

ANILCA PROGRAM

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July 24, 2012

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

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

New Public Overflight Restriction Area

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

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

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July 24, 2012

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

Thank you for your attention to this matter.

Sincerely,

Brad Palach
Natural Resource Manager III

cc: Craig Fleener, Deputy Commissioner, ADF&G

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
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July 9, 2012

ALCOM Public Affairs
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Ladies and Gentlemen,

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

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

The following are the comments of the Department.

Coordination

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

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Administrative Activities Conducted by the Alaska Department of Fish and Game

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

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

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

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

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

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

Nelchina Caribou Herd and Moose Calving

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

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

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

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

Delta Caribou Herd

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

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

Talkeetna Dall Sheep

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

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

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

Delta Bison

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

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

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

Wildlife Mortalities

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

Habitat Enhancement and Stream Crossings

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

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Bears

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

New Public Overflight Restriction Area

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

Harvest of Wildlife for Subsistence and other uses

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

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

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

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

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Also related to subsistence and other uses,

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

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

Safety

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

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

Watana – Susitna hydroelectric Project

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

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

Civilian Airspace Management

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

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

Major Fighting Exercises (MFEs)

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

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

Spelling

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

Page Specific Comments

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

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

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

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

Mid summer: Dall sheep surveys*

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October 1-10: Caribou composition survey*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

• *All alternatives:*

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

Appendix I

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

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

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

Appendix G

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

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

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

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

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

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

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

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

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Appendix K, Mitigation Measures

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,


Craig L. Fleener
Deputy Commissioner

G0023

[REDACTED]

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

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

Thank you,

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

July 9, 2012

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

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

Dear Sir,

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

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

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

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

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

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

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

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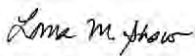
without a corresponding reduction in military restrictions and use of Alaska land and air space assets.

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

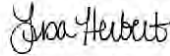
Thank you for the opportunity to offer comment on the *Draft JPARC EIS*. The Greater Fairbanks Chamber of Commerce looks forward to continuing a productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,

GREATER FAIRBANKS CHAMBER OF COMMERCE



Lorna Shaw
Board of Directors, Chair



Lisa Herbert
Executive Director



Steve Lundgren
Military Affairs, Chair

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

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

G0024

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

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

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

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

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

G0024



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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

July 9, 2012

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

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

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

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

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

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

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

Sincerely,

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

Marie Steele, Large Project Coordinator
Alaska Department of Natural Resources

G0024

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

cc:

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

AEA Comments JPARC Modernization and Enhancement EIS

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July 9, 2012

INTRODUCTION

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

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

DESCRIPTION OF SUSITNA-WATANA PROJECT

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

Transportation Access

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

akenergyauthority.org

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

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

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

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

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

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

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

- Speed restrictions will be imposed along appropriate segments;

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

Electric Transmission Facilities

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

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

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

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

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

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

Access to the transmission line corridors will be:

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

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

Dam and Reservoir

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

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

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

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

Hydroelectric Facilities

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

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

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

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

Ancillary Facilities

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

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

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

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

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

SUMMARY

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

G0024

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "Wayne M. Dyok", is written over a horizontal line.

Wayne M. Dyok, Project Manager

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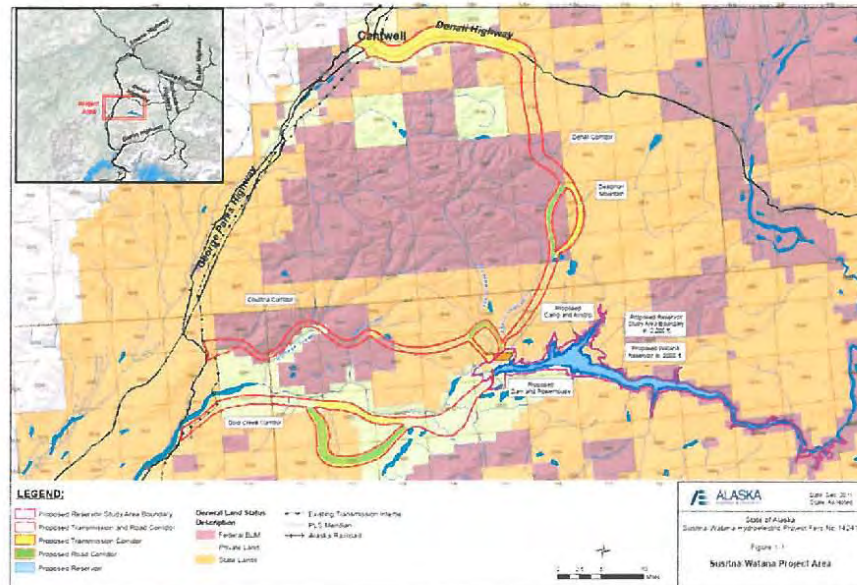


Figure 1 Susitna Watana Project Area

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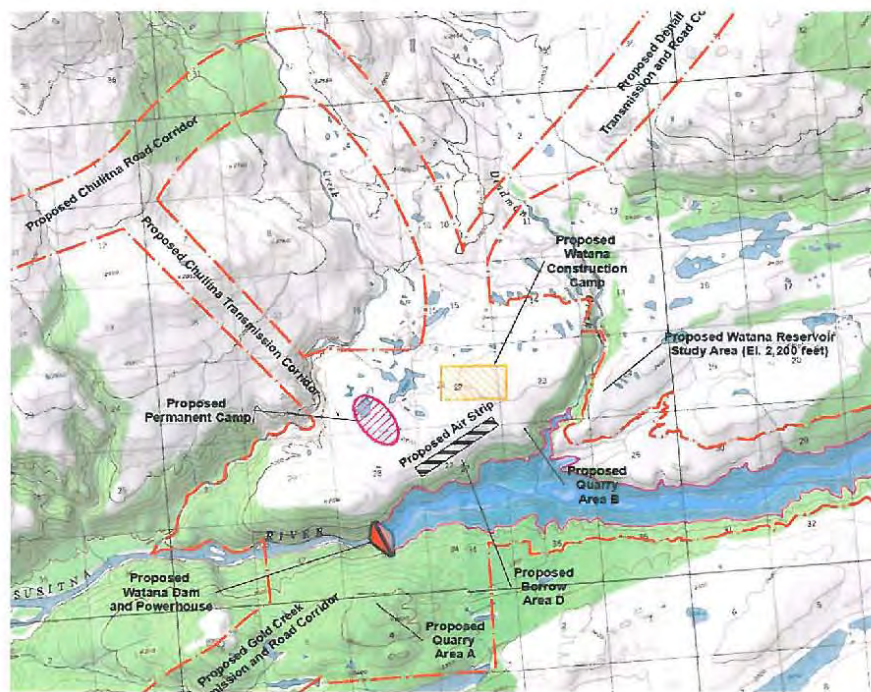


Figure 2 Project Site

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[REDACTED]

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

To Whom it May Concern,

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

Respectfully,

Michele Cruz

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

[REDACTED]

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

#	Location			Comment Reviewer	Response
	Page	Line	Section		
1 2-	20	21-23	2.1.3.1	The BAX (if approved) should only be usable on a daily basis from SFC to 5999 MSL. The airspace above should be with the same time parameters (if at all) as the Delta MOA. If released above 5999MSL on a daily basis, will result in a negative impact the National Airspace System as stated in the letter dated March 11, 2011.	
2	2-4		Table	Alternative "A" for the proposed FOX 3 MOA extends too far south and west. As stated in the Letter from Anchorage Center on March 11, 2011. This would have a negative impact on the National Airspace System as well as Anchorage Center. This statement applies throughout the document where the proposed FOX 2 MOA is addressed	
3 2-	32		Table	Transition between R2205 and R2202 - The altitudes on this transition are unrealistic. This would be a major impact to Customers of the National Airspace system and Anchorage Center. 7000 MSL would be the highest altitude Anchorage Center could recommend.	
4 ES-1	6	7, 10		The word "mostly" is contained throughout the document. Suggest modifying the verbiage to more concise terms. Stating you will be mostly using existing targets and impact areas indicates additional impact areas will be impacted.	
5 1-	1	12		The FAA is a cooperating agency based in part on the DoD FAA MOU found in Appendix 7 of FAA Order 7400.2 which state that "When the DoD proposes that the FAA establish, designate, or modify SUA, the FAA shall act as a cooperating agency for the evaluation of environmental impacts." Suggest adding verbiage referring to the MOU in both Chapter 1 and in the Executive Summary.	
6 1-	32	10	1.6.1	Recommend rewording the sentence stating "FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways" to be in line with FAA Order 7400.2 Section 2, 1-2-1 which states: "The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of aircraft and its efficient use."	
7 A1				Suggest doing a "FITND" function and use nonparticipating instead of civilian throughout the document	

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

#	Location			Comment Reviewer	Response
	Page	Line	Section		
82	5	20	2.1.1.1.1	Other times by NOTAM is something that should be more clearly spelled out. Especially if this has the potential for being a daily event	
9	2-6		Table 2-3	Add "ATCAA" to Paxton in the second section	
10	2-6	8	2.1.1.1.1	Data is 4-6 years old now	
11	3-32	12	3.1	Believe "no to" is a typo. The line does not make sense, please clarify.	
12	General	General	General	As per FAA comments given March 2011: The close proximity of the proposed Fox 3 & Paxton MOA remains a concern due to its close proximity to Anchorage Terminal Radar Approach Control's airspace.	
13	3-178	1	3.3	See comment 1 on the BAX	
14	3-190		Figure 3-26	Noise contour levels indicate that currently there are no baseline peak blast noise levels in the 130dB contour and there are several additions to that under the proposed action (pink contours). However, it is indicated in the verbiage on page 3-187 line 31 that there are no impact areas not already affected by current conditions. Please clarify.	
15	3-282.1		3.6 All	Currently is against FAA policy to establish or designate airspace solely for the use of UAV/UASs.	
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U.S. Department
of Transportation
Federal Aviation
Administration

Federal Aviation Administration

1601 Lind Avenue Southwest
Renton, Washington 98057

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

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

To Whom It May Concern:

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

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

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

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

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

Sincerely,

John Warner
Manager, Operations Support Group
Western Service Center

Attachment:
JPARC Comment Response Matrix

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

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	Page	Line	Section		
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4	ES-16	7, 10			The word "mostly" is contained throughout the document. Suggest modifying the verbiage to more concise terms. Stating you will be mostly using existing targets and impact areas indicates additional impact areas will be impacted.
5	1-1	12			The FAA is a cooperating agency based in part on the DoD FAA MOU found in Appendix 7 of FAA Order 7400.2 which state that "When the DoD proposes that the FAA establish, designate, or modify SUA, the FAA shall act as a cooperating agency for the evaluation of environmental impacts." Suggest adding verbiage referring to the MOU in both Chapter 1 and in the Executive Summary.
6	1-32	10	1.6.1		Recommend rewording the sentence stating "FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways" to be in line with FAA Order 7400.2 Section 2, 1-2-1 which states: "The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of aircraft and its efficient use."
7	All				Suggest doing a "FIND" function and use nonparticipating instead of civilian throughout the document

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

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	Page	Line	Section			
8	2-5	20	2.1.1.1.1	Other times by NOTAM is something that should be more clearly spelled out. Especially if this has the potential for being a daily event		
9	2-6		Table 2-3	Add "ATCAA" to Paxton in the second section		
10	2-6	8	2.1.1.1.1	Data is 4-6 years old now		
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13	3-178	1	3.3	See comment 1 on the BAX		
14	3-190		Figure 3-26	Noise contour levels indicate that currently there are no baseline peak blast noise levels in the 130dB contour and there are several additions to that under the proposed action (pink contours). However, it is indicated in the verbiage on page 3-187 line 31 that there are no impact areas not already affected by current conditions. Please clarify.		
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[REDACTED]

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

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

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

G0026

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SEAN PARNELL,
Governor

3700 AIRPORT WAY
FAIRBANKS, ALASKA 99709

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

July 9, 2012

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

Dear Lt. General Hoog:

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

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

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

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

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

G0026

Lt. General Steve Hoog
JPARC Draft EIS

July 9, 2012

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

FOX 3 MOA Expansion and New Paxon MOA

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

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

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

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

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

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

G0026

Lt. General Steve Hoog
JPARC Draft EIS

July 9, 2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Special Use Airspace Information Service

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

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

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

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

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

Unmanned Aerial Vehicle Corridors

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

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

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

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

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

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

Subsistence

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

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

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the road system and have similar access to alternative resources. In addition, for the eight communities listed in Table 3-24, an average of 97.25% of households participated in subsistence, with no community having less than 92.7% participation. For the seven communities for which information was available, residents harvested an average of 158 pounds of subsistence resources per capita. Harvest for Paxson, which is ranked as having a medium dependence, harvested 289 pounds per capita. This is more than the amount of per capita harvest for Dot Lake (115 pounds) and Gulkana (152 pounds). However, both of those communities were ranked by the DEIS as having a high dependence on subsistence.

A more realistic assessment of the subsistence harvest data for these communities would indicate that all of them have a high dependence on subsistence. As we did in our scoping comments, we point out that the preference for subsistence uses on Federal public lands in Alaska is provided to all rural residents, both Native and non-Native, under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Congress made that finding very clear in Section 801(4):

"in order to fulfill the policies and purposes of the Alaska Native Claims Settlement Act and as a matter of equity, it is necessary for the Congress to invoke its constitutional authority over Native affairs and its constitutional authority under the property clause and the commerce clause to protect and provide the opportunity for continued subsistence uses on the public lands by Native and non-Native rural residents;"

Ranking a community's dependency on subsistence resources on the basis of the percentage of Native or non-Native residents is inconsistent with both ANILCA Title VIII, as well as federal and state regulations. While it may be appropriate to rank an affected community's dependency, other criteria should be used. We suggest that the discussion in Section 3.1.13 and any discussion of statutory or regulatory provisions in Section B.13.2 be revised accordingly.

To avoid significant adverse impacts to hunting activities regulated under the State of Alaska's general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxson MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption of big game hunting in these areas during the peak seasons.

Fox 2 MOA and Eielson MOA

These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.

Realistic Live Ordnance Delivery Area

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The Commission is concerned about this proposal which would affect 163,230 acres of State owned land under Alternative A and 234,600 acres of State owned land under Alternative B. As the DEIS points out, this area is located within State Game Management Unit (GMU) 20A and is extensively used for moose hunting, with over 4,000 moose permits issued annually. More than 1,100 moose were harvested from GMU 20 A over the last several years. Also harvested are brown bear, black bear, and Dall sheep. Trapping also occurs throughout the entire area. More importantly, this is a priority use area by residents from the Fairbanks area. Any reduction in use would have significant impacts on area hunters and trappers. Should this proposal be adopted under either alternative, specific mitigation measures must be developed in consultation with the Alaska Department of Natural Resources and the Alaska Department of Fish and Game.

In addition, because this proposal would require action by the Alaska Department of Natural Resources to reclassify this area, the Commission will submit to the department any recommendations it may determine appropriate and to be within the scope of its responsibilities.

We again appreciate the opportunity to comment on this project. Please maintain our contact information for future notifications, and contact our office if there are questions about our comments. Thank you.

Sincerely,


Stan Leaphart
Executive Director

Cc: Governor Sean Parnell
Commissioner Dan Sullivan – ADNR
Commissioner Cora Campbell – ADF&G

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

July 9, 2012

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

Re: EPA comments on the Draft Environmental Impact Statement for the Alaskan Command's Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, EPA Project #10-066-DOD.

To Whom It May Concern:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Alaskan Command's (ALCOM) Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, Alaska (CEQ # 20120090). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

We appreciate ALCOM's effort to comprehensively evaluate all twelve actions (six projects and six programmatic actions) identified as appropriate for evaluation in the recently developed Joint Pacific Alaska Range Complex Master Plan. We believe this has added value to the consideration of cumulative impacts and provides for more complete disclosure of impacts for the decision maker as well as the public. However, we note that the complexity of multiple projects and actions without identification of preferred alternatives makes the review quite challenging.

Because preferred alternatives are not identified, and because the potential intensity of impacts varies greatly from alternative to alternative, we have rated the impacts associated each alternative individually. Please see the table below identifying our ratings and rating justification. Definitions of our ratings are attached.

Action	Rating	Justification
FOX 3 MOA Expansion and New Paxson Military Operating Area (MOA)	EO	Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety; adverse impacts to air quality, biological resources, access, subsistence and environmental justice.
Realistic Live Ordnance Delivery	EO	Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety.
Battle Area Complex Restricted Area	EC	Adverse impacts to aviation, noise receptors

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Expand Restricted Area R-2205	EC	Potentially moderate impacts to noise, air and land use, hazardous waste, and multiple socioeconomic resources
Night Joint Training	LO	No or minimal adverse impacts to resources
Unmanned Aerial Vehicle Access	EC	Potentially serious impacts to airspace use and aviation safety
Enhanced Ground Maneuver Space	EO	Potentially serious impacts to aquatic, physical, and biological resources
Tanana Flats Training Area Roadway Access	EO	Potentially serious impacts to aquatic, physical, and biological resources
Joint Air-Ground Integration Complex	EC	Potentially serious impacts to physical and biological resources
Intermediate Staging Bases	EC	Potentially serious impacts to physical and biological resources
Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska	LO	No or minimal adverse impacts to resources
Joint Precision Airdrop System Drop Zones	EC	Potentially serious impacts to socioeconomic resources

We have given the EIS an overall adequacy rating of “2” (Insufficient Information). Generally our impacts (alpha) rating is based on our concerns regarding potential impacts to water quality and aquatic habitats, noise receptors, air quality, subsistence, and other socioeconomic factors, such as safety and other adverse impacts to the private aviation community. Our adequacy rating is based on the concerns we have with the criteria used for the “subsistence community” analysis, additional information needed for direct and cumulative impacts analysis, and lack of use of monitoring data from previous projects (e.g. 1997 Alaska MOA EIS) to help inform this EIS.

We recognize the need for the transition to different training activities to fully meet the training and testing requirements for forces and activities in and near Alaska. We also recognize, however, that an increase and expansion of military training activities and areas will result in additional impacts to surrounding communities, users, and resources. We offer the following recommendations to avoid, minimize and mitigate adverse impacts.

Potential Impacts

We recommend that ALCOM continue to work closely with potentially impacted stakeholders (general and commercial aviation owners and groups, tribal governments, land owners, subsistence and sport hunting groups and resource managers) to identify ways to further avoid, minimize, and mitigate adverse impacts, particularly in the resource areas of aviation safety and subsistence. We also specifically recommend that ALCOM work closely with our agency, as well as the Alaska Department of Conservation, to further minimize potential impacts to physical and biological resources from air emissions and noise, the generation of hazardous wastes, and discharges into waters of the U.S.

Discharges and Hazardous Wastes

We are particularly concerned about possible discharge of live munitions into aquatic environments. Depending on the constituents of the munitions, adverse and potentially lethal impacts, such as those

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seen at Joint Base Elmendorf-Richardson Eagle River Flats, could occur. We recommend that for required live firing training, every effort be made to discharge munitions that do not contain white phosphorus or other constituents that could cause increased mortality in waterfowl similar to what was occurring at Eagle River Flats. Wastewater discharges associated with construction stormwater are included in the discussions of several proposed actions. There does not appear to be discussion of the discharge of munitions, which are also regulated under the National Pollutant Discharge Elimination System. This permit program is scheduled to be transferred from the EPA to the State of Alaska on October 31, 2012, as part of the Phase IV transfer of the Alaska Pollutant Discharge Elimination System. For more information about program transfer, please see the Alaska Pollutant Discharge Elimination System website at <http://dec.alaska.gov/water/APDES/phaseIVextension.html>.

We also recommend that the final EIS include, as applicable, a discussion of Spill Prevention, Control and Countermeasure Plans and Facility Response Plans, as required by the Clean Water Act and the Oil Pollution Act of 1990. Finally, we recommend that the final EIS provide detailed information regarding the anticipated types of hazardous wastes that will be generated as part of the proposed action, how the wastes will be managed, and the plans for disposal in accordance with federal, state and local requirements. The EPA regulates hazardous wastes under Subtitle C of the Resource Conservation and Recovery Act.

Subsistence

To address impacts to subsistence, we recommend further coordination with the Alaska Department of Fish and Game Subsistence Division and Board of Fisheries as well as Federal Subsistence Board to determine if additional measures (such as timing windows, higher minimum altitude) would substantially reduce the potential impacts identified in the EIS, particularly from FOX 3 MOA Expansion, New Paxson MOA and Realistic Live Ordnance Delivery proposed actions.

Aviation

To address the potentially serious impacts to aviation and aviation safety, we encourage you to continue working with commercial and general aviation groups as well as individual owners and operators, and the Airports Divisions within ADOT and FAA to determine if additional avoidance, minimization, or mitigation measures can further reduce impacts, particularly to aviation safety. As identified in the EIS, general and small commercial aviation are critical modes of transportation for communities in rural Alaska, including those identified in the project area. For residents in these communities and in more remote locations, effective communication regarding training activities is often difficult. If information regarding the occurrence and scheduling of such activities is not received by the private operators, or is not timely, safety can be seriously compromised. Therefore, we recommend that work be done to ensure the current effectiveness of the existing Special Use Airspace Information Service that is currently used to inform civilian pilots when MOA and restricted areas are activated. If this information is currently available it should be included in the final EIS. If it is not, we recommend that a study be undertaken to determine its effectiveness. If deficiencies are identified, we recommend that improvements be implemented, preferably before the signing of the Record of Decision.

Cumulative Effects

We recommend that coordination with the Federal Energy Regulatory Commission occur to ensure that the most current proposed activities associated with the Susitna-Watana Hydroelectric Project are considered in the cumulative impacts analysis in the final EIS.

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Adequacy

To improve readability, we recommend a detailed table outlining alternatives for each proposed action and a detailed discussion regarding each alternative by resource. We recognize that such a table with “averaged” impacts is currently included in the Executive Summary, but it is important that the EIS present the “sharp contrast” between alternatives. While the narrative in the effects section does this to a certain extent, a detailed table would be helpful to readers to visually present the information.

We also expect that the final EIS will contain much greater detail regarding aspects such as the locations of facilities, access roads, numbers of aircraft, and estimated acres of impact, as well as discussion of the potential impacts associated with proposed structures and project activities. We are particularly interested in the quality, acreage and functions of waters of the U.S. that will be impacted by the discharge of dredged or fill material, and wastewater discharges. We request that for specific proposals where it is appropriate or feasible, a draft Clean Water Act 404(b)(1) analysis be drafted and included as an appendix to the final EIS. By including this analysis for project-specific EISs, permitting decisions under Section 404 can be coordinated with other agency decisions, including the consideration of whether the proposed discharge would represent the least environmentally damaging practicable alternative.

Currently the criteria being used for the subsistence community analysis appears to be based on an arbitrary racial composition, and it seems to discount the common practice of rural Alaskan residents to rely on subsistence resources. Other factors that contribute to this reliance are proximity to food stores and U.S. Post Offices. We recommend that these additional components be considered for the subsistence analysis in the final EIS. If the final EIS relies on the current criteria, we recommend that the document include a discussion of the basis for these criteria.

Mitigation and Monitoring

We appreciate the inclusion of Appendix K, Mitigations, Best Management Practices, and Standard Operating Procedures. We request that the final EIS include avoidance and mitigation measures (e.g. restrictions to avoid lambing, buffers along Wild and Scenic corridors) identified by the Bureau of Land Management, Alaska Department of Fish and Game, and other agencies responsible for the protection and conservation of public resources in previous and more recent correspondence in response to scoping and review of the draft EIS.

We also recommend that additional information be included in the final EIS to clearly distinguish between those mitigation measures that ALCOM has the authority to implement, and those which it cannot and thus, would require the involvement of other agencies to execute them. We believe this information would be consistent with CEQ's Guidance, *Appropriate Use of Mitigation and Monitoring and Appropriate Use of Findings of No Significant Impact*, issued in January 2011 (http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf). Finally, and also in line with the mitigation guidance, we recommend that a draft adaptive management plan be identified and included in the final EIS to monitor and ensure the success of future mitigation efforts.

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Again, we appreciate the opportunity to offer comments on the draft EIS and look forward to working with ALCOM on addressing the issues we have identified for the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov, with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure

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**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

G0028


From: Terry Mudd [REDACTED]
Sent: Thursday, July 12, 2012 1:54 PM
To: ALCOM J08 Admin Box
Subject: Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA

Please "Take No Action" and leave the MOA "as is". Flying in Alaska is hard enough with the unpredictable weather, mountains and an abundance of MOA and restricted areas.

Respectfully
Terry Asbury
Denali Borough Assembly member

N.2.2 Tribal Comments in Order by Identifier ID Number

T0001



Chickaloon Village
Traditional Council
(Nay'dini'aa Na')

May 21, 2012

Gary Harrison,
Traditional Chief

Doug Wade,
Chairman/Elder

Rick Harrison,
Vice-Chairman

Penny Westing,
Secretary/Elder

Albert Harrison,
Treasurer/Elder

Jess Lanman,
Elder Member

Burt Shaginoff,
Elder Member

Larry Wade,
Elder Member

Shawna Larson,
Member

Jennifer Harrison,
Executive Director

Dr. Jerome Montague
Native Affairs Advisor
Headquarters Alaskan Command (ALCOM)
Joint Base Elmendorf-Richardson Alaska
9480 Pease Avenue, Suite 110
Joint Base Elmendorf-Richardson, AK 99506-2101


Dear Dr. Jerome Montague,

I am writing this letter to you in order to continue the open communication that we established when we previously met in your office in February 2011. Our Tribal citizens have recently expressed concerns about the US Air Force's airplanes in our area and we have several questions:

- What are the Air Force's lateral boundaries along the river valleys? If your limit is 5,000 feet from ground level, how close are you allowed to be next to a mountain when you are flying in a valley?
- Is the Air Force allowed to fly lower than 5,000 feet if you are flying at a slower speed?
- Is the Air Force currently flying or are you planning to fly unmanned aircraft in the Matanuska Watershed area?

I look forward to your response. If you have any questions or need clarification, you can all me at 907-745-0749. I look forward to working with you.

May Creator Guide Our Footsteps,


Doug Wade
Chairman

P. O. BOX 1105 Chickaloon, Alaska 99674
e-mail: cadmin@chickaloon.org

Phone (907) 745-6707 Fax (907) 745-0709
Home Page: <http://www.chickaloon.org>

T0002



KNIK TRIBAL COUNCIL

KNIK, THE OLDEST VILLAGE IN COOK INLET

oh.
(54)

To J7

July 9, 2012

LT. GEN. STEPHEN L HOOG
Commander, Alaskan Command
9480 Pease Ave., Ste. 110
Joint Base Elmendorf Richardson, AK 99501-2101

RE: Joint Pacific Alaska Range Complex – Draft EIS

Dear Lt. Gen. Hoog:


Department of Defense Instruction No. 4710.02, and Executive Order 13175 provides for a protocol and process for meetings and consultation on the development of policies that have implications upon tribes. The Knik Tribal Council formally requests government to government consultations in addressing the tribe's concerns and interests regarding the proposed military operational area expansion to the Joint Pacific Alaska Range Complex.

The Knik Tribal Council has specific concern with the effect of the proposed undertaking upon the tribe's cultural and subsistence resources within the Fox 3 MOA, the Fox 3 MOA Expansion, and the Paxson MOA. The tribe cannot support the proposed expansion without first having the opportunity to participate directly in determining the extent of the project's impact upon the tribe, its lands and the resources that it depends upon. The wildlife in the proposed areas is of significant importance to the tribe and it is our contention that increased military training exercises would impact the migration, production and continued sustainability of the tribe's wildlife resources in these areas.

We are asking to be directly involved in mitigation efforts involving the monitoring of impact to wildlife and how the tribe can participate, both in gathering and collecting the data and information; and in developing the conclusions and findings on the implications to the tribe.

Please work with Richard Porter, Knik Tribal Council Executive Director in implementing our request. His contact information is below.

Sincerely,


Debra Call
President

P.O. BOX 871565
WASILLA, AK 99687

(907) 373-7391
(907) 373-7393

FAX: (907) 373-2161 E-MAIL: RPORTER@KNIKTRIBE.ORG

N.2.3 Non-government Comments in Order by Identifier ID Number

N0001

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0001	Carl Sieber	Vice Chairman	Alaskan Aviation Safety Foundation	NEPA Process	<p>The Alaskan Aviation Safety Foundation (AASF) respectfully requests an extension of the comment period for submitting comments on the Draft Environmental Impact Statement (DEIS) on the Joint Pacific Alaska Range Complex public noticed on March 30, 2012. We request a total comment period of 120 days from the date of the public notice. The National Environmental Policy Act (NEPA) sets forth specific guidelines and requirements for preparing environmental documents and setting time lines for the public to respond. 40 CFR (§) 1502.7 suggests a final EIS should consist of 150 pages, and proposals of unusual scope or complexity shall normally be less than 300 pages. We expect that this draft document is approximately the same length as we should anticipate for the final. The page count is defined in §1502.10. My computer tells me the JPARC DEIS is 655 pages for the pages meeting the definition in §1502.10 d through g. We also note that the total document including appendices is 1,394 pages. §1506.10 (c) says that the comment period should be not less than 45 days on draft statements, and can be extended to accommodate public comments. The AASF feels that a short extension to 120 days total is reasonable and will not adversely affect the USAF decision making process or schedule. The AASF has tried to assemble comments before the published June 7, 2012 deadline, but find that our volunteers will not be able to meet that deadline. We therefore find it necessary to request a further extension in order to provide meaningful comments. USAF staffs have already publicly acknowledged that this is a complex document, and our volunteers can concur. The Congress of Environmental Quality (CEQ) has offered informal guidance that agencies should offer the public every opportunity to provide comments in order to help agencies such as the USAF to make better decisions. The AASF sincerely hopes that the USAF decision makers concur. Thank you for your consideration, and we look forward to your favorable response.</p>

N0002

44

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

3 MR. RAZO: Good evening. My name is Gregory Razo. I work
4 as a Vice President at Cook Inlet Region, Incorporated. Our
5 company calls itself CIRI. We are the regional Alaska Native
6 corporation for Southcentral Alaska headquartered here in
7 Anchorage. We also are delegated the tribal authority for the
8 Anchorage region.

9 In general our company has had an opportunity to review
10 the Joint Pacific Alaska Range Complex proposal and Draft EIS.
11 We believe that the Joint Pacific Alaska Range Complex allows
12 for unprecedented training opportunities for our war fighters
13 that are not found in any other region of the United States and
14 we encourage the development of the JPARC process.

15 We think that in terms of the work done to date with
16 regard to the six definitive proposals they have adequately
17 addressed the specificity, dependence, definition and ripeness
18 requirements of the EIS and in particular with regard to the
19 programmatic proposals we strongly support programmatic proposal
20 eight, nine and 10 which deal with the proposed Tanana Flats
21 training area roadway access, the proposed joint air ground
22 integration complex and the proposed intermediate staging bases.

23 In reviewing the anticipated environmental impacts from
24 the JPARC proposal we are happy to see that there is determined
25 to be little impact on the subsistence uses of the affected

[REDACTED]

N0002

45

1 areas. Subsistence is very important to the Alaska Native
2 people and the ability to access those resources which have been
3 the resources of our people for thousands of years should be
4 maintained and not impacted by the JPARC proposal.

5 Additionally, I think that with regard to the socio and
6 economic impacts of the JPARC proposal that the Department of
7 Defense should also consider not just the adverse impacts, but
8 the substantial positive impacts that development of
9 particularly the programmatic proposals that I mentioned
10 previously will have for job opportunity and training and
11 workforce development, particularly for our Alaska Native
12 people. Those regions that are going to be affected by the
13 JPARC development are areas of high unemployment where there is
14 little opportunity for work and the work that would be
15 associated with this proposal would be good work for our people.

16 For all of those reasons Cook Inlet Region, Incorporated,
17 supports this Draft EIS. Thank you.

18 UNIDENTIFIED MALE: Thank you.

19 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

N0003

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

Written Comment Form

For more information and to submit comments online, please go to:
www.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): Kern Aiton Date: 5/18/12
Title: Legislative Liaison / Member
Organization: Delta Sportsman's Assn / ADFLG Advisory Committee
Is this a government agency (choose one): ☐ yes ☒ no
Comment submitted on behalf of (choose one):
☒ your organization/business/agency
☐ yourself as an individual

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

N0003

Comment(s):

Each:
I am a combat veteran that understands
and appreciates the need for enhanced military
Training -

A half century ago, the military
displaced us from our homes in the Mt. Rogers
Blair Lake State Refuge to create a bombing range.

I have experienced near-miss situations
with A-10s in Iowa Ridge Area -

For 3
500 AGL

Paxon
MOA
500 AGL

~~that~~
To create a 500 AGL flight zone, especially
in the Paxon MOA, with aircraft much faster
than A-10s will be extremely hazardous
for local pilot citizens, especially in September.

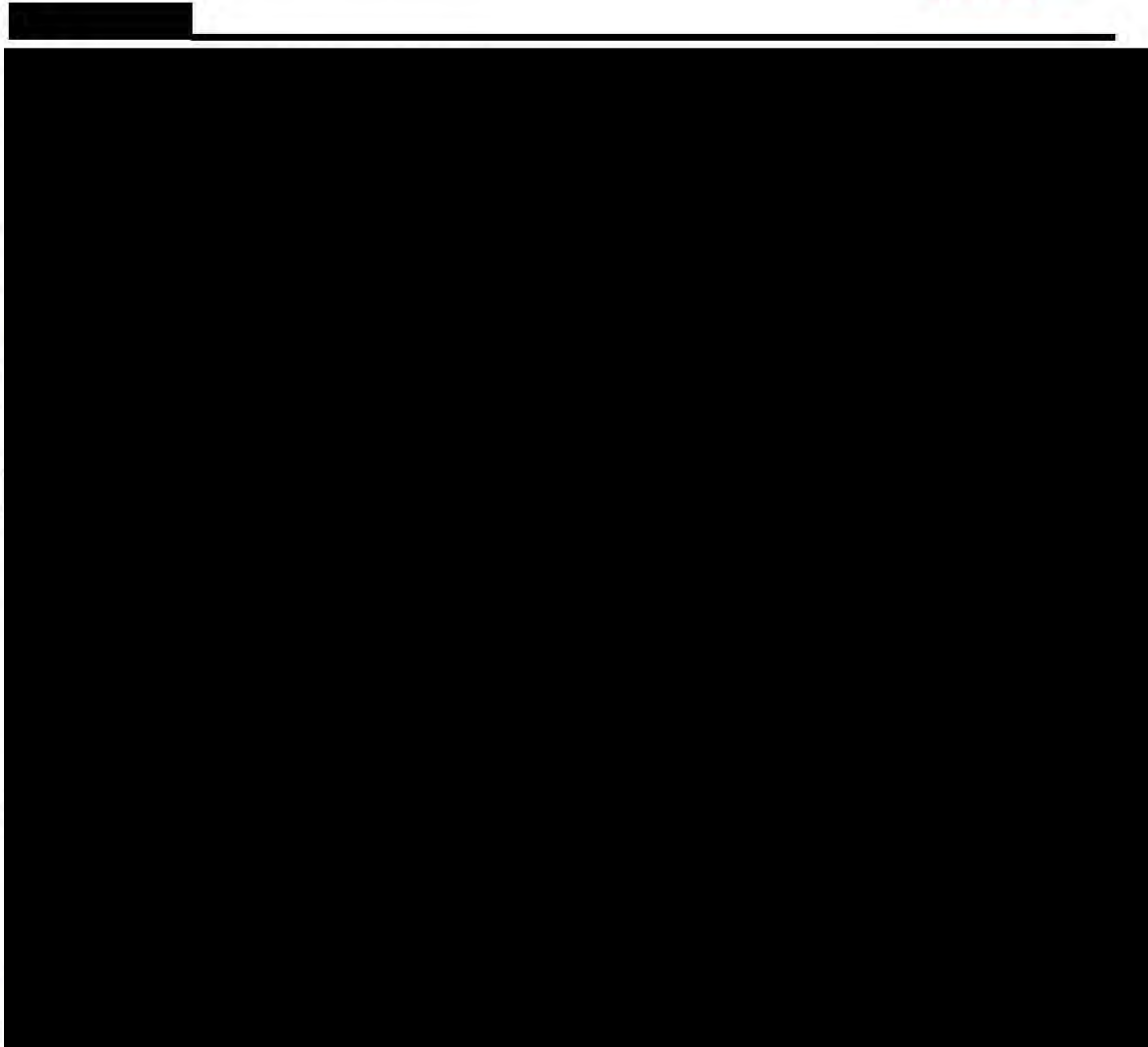
large waterfowl flocks are also an
extreme hazard near Delta & Delta/Tanana
Rivers -

Use additional sheets as needed.

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

Thank you for your input.

N0004



From: Martin, Melissa [REDACTED]
Sent: Wednesday, May 23, 2012 4:59 PM
To: Tarver, Jason E.; Pearson, Karen M.
Subject: JPARCEIS Website Support

To Whom It May Concern,

My name is Melissa Martin, I work in the Air Traffic Division at Aircraft Owners and Pilots Association. I am looking to submit comments on the website, I see that there is an area for written form comments but not a way to attach a document. I have gone ahead and attached AOPAs comments to this email, please provide me with confirmation that it was received/ passed along to the correct person who can address our concerns. If there is another way to attach a document via the website please let me know. Thank you.

N0004



www.aopa.org

May 23, 2012

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

Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex

To Whom It May Concern,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period.

Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National Environmental Policy Act (NEPA).

AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed actions. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings.

AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams".

Heidi J. Williams
Vice President
Air Traffic Services and Modernization

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

N0005

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0005	John Delaquito	Owner	Lake Louise Lodge	Description of Proposed Actions and Alternatives (DOPAA), Airspace Management, Noise, Safety (Airspace), Safety (Ground), Physical Resources, HAZMAT, Biological Resources, Subsistence, Air Quality, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I oppose the use of the Fox 3 MOA area for a number of reasons which include the following: 1) The area being requested for the Fox 3 is used by a very large amount of people for fishing and hunting recreation, birdwatching, and residents like myself who live in this area on a full-time basis. 2) This area is easily accessible by people that reside all over the state but many live in close proximity to Anchorage and the Matanuska Valley. It is a popular area for private pilots and small commercial pilots/guides and question the necessity of the additional air space that is being requested. 3) The necessity of the additional area is questioned and it is in fact really needed for training area. The Lake Louise tri-lake area is the largest lake system in Alaska which you can drive to and should be preserved for a recreational location for all residents of the state to enjoy. It would make sense to use a more remote area for this training. Thank you for your consideration in not expanding the air space area. In summary, for the preservation of our tranquil environment, wildlife, and enjoyment of our homes, please do not expand this area for your training.



N0006

10

1 four months.

2 The expand or have a boundary say from the Denali Highway
3 north, Talkeetna, Richardson Highway, use that -- don't use that
4 in the month -- for four or five months out of the year and
5 maintain at least 5,000 feet above with your original MOA. We
6 just don't need the conflict with our revenue, tourism, three
7 major holidays and hunting season. And I do a tremendous amount
8 of flying in the Basin in that time and that's just one more
9 thing I got to watch out for. That's one of our main concerns.

10 But we got a tremendous amount of land here and, again, I
11 don't think we should be whipping around here over the top of
12 everybody's houses, homes, cabins. Call it what you like, but
13 essentially it's going to disrupt a tremendous amount of
14 revenue. Thanks.

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

[REDACTED]

N0007

[REDACTED]

17 MS. MCHENRY: Thank you. My name is Ruth McHenry. I
18 represent Copper Country Alliance which is a nonprofit
19 organization in the Copper Basin that seeks to protect our
20 natural resources and the way that people use them. This is
21 such a complicated document and I haven't had time to really go
22 through it, that these are very, very preliminary remarks that
23 I'm making tonight. I'm going to, however, come out in support
24 of the no action alternative. I'm going to limit my comments to
25 Fox 3 and to Paxson MOA,


[REDACTED]

N0007

1 As I said, I haven't looked deeply into the EIS, but where
2 I have it seems to me to be quite inadequate in spite of its
3 great length. I have the impression that the writers simply had
4 a lack of knowledge of this area and its resources. Probably it
5 was written by those who don't live here in the Basin and if
6 they are living in Alaska haven't been here for a long time and
7 probably won't be here for a long time. I -- we are used to
8 seeing environment impact statements that are written by people
9 who live and work here and they're very different.

10 I want to make an example of the cumulative impact area.
11 With regard to cumulative impacts, I haven't found any mention
12 of the Susitna Dam which would greatly affect this area and our
13 biological resources or recreation. No mention of the mineral
14 exploration and possible development around Tangle Lakes. No
15 mention of biomass harvest, climate change. I did find
16 cumulative impacts regarding the oil pipeline and the gas
17 pipeline, but not with respect to the biological resources, only
18 with respect to some of the other resources.

19 With respect to biological resources, there is a very
20 short paragraph on cumulative impacts with other non-military
21 actions. In other words, how does this proposal relate to
22 things that are going on that are non-military in terms of
23 effects on us. No substantive non-military actions have been
24 identified for the areas under the proposed expanded Fox 3 or
25 Paxson MOAs. Therefore, contributions of non-military actions



5 Biological resources, recreation and subsistence all
6 intermesh. Biological resources are essential to subsistence
7 and to almost all recreation and I think that recognition is
8 lacking in this EIS and it makes for a very confusing document.
9 Thank you for your time and for making this opportunity
10 available.

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

N0008

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

4 MR. MARTINEK: Yeah, my name is Gary Martinek, M-A-R-T-I-

5 N-E-K. I'm the hatchery manager at Gulkana hatchery, a State

6 facility started in 1973. This is the largest sockeye facility

7 in the world. It's three miles north of Paxson Lodge on a

8 series of springs. The salmon that we provide are basically

9 used for commercial fishing, subsistence, personal use and sport

10 fishery. The upper Copper River is the source of one of the

11 most valuable sockeye and king salmon resources in the state.

12 Besides the hatchery springs, there are over 10 different wild

13 sockeye stocks and at least six different stocks of wild king

14 salmon and the most northern stock of wild rainbows in the

15 United States. Like Luke Catledge mentioned, our single biggest

16 concern is during this window of incubation which is roughly --

17 can be 120 days. These eggs are extremely susceptible to any

18 type of noise or shock and can be killed with just a simple

19 sound of a gunfire in an incubator. And we definitely would

20 like you to relook at this situation. I mean this is a very,

21 very valuable resource to not just people in the state of

22 Alaska, but people world wide. So thank you.

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

[REDACTED]

N0009

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

8 MR. CATLEDGE: Thank you. My name is Lucas Catledge, C-A-

9 T-L-E-D-G-E. I work with the Gulkana hatchery here locally and

10 my main concern is probably the sonic booms. And working at the

11 salmon hatchery here in the fall especially when we have eggs

12 loaded in the incubators I see that as a potential threat to the

13 safety of the eggs. They're very susceptible to shock and even

14 at the 5,000 foot a sonic boom will rattle and shake things here

15 on the ground. And fortunately we haven't seen any substantial

16 loss in the past, but I see here on the scheduling for their red

17 flag training exercises that this year's proposed to be August

18 -- or scheduled to be in August and again in October. And that

19 first date, August 6th through the 17th, is when we're first

20 loading eggs into the incubators and they're very fragile until

21 they eye up. That's about two months in time. And so that

22 would extend -- and our main egg take extends into the first

23 part of October often and so the eggs are a very fragile state

24 at the -- at that point. And so like I said, even at 5,000 feet

25 a sonic boom directly over the canyon would be detrimental.

■ [REDACTED]

57

2 And that's all of my comments. Thanks.

[illegible]

— 100 —

N0010

[REDACTED]

25 MR. PETERSON: My name is Tony Peterson, P-E-T-E-R-S-O-N.


[REDACTED]

N0010

1 I represent Paxson Lodge. I'm also the President of the
2 Community of Paxson. My concerns mostly are the effect on
3 tourism along with this lodge being as old as it is the sonic
4 booms, the possibility of blowing out windows and guests being
5 in the rooms. If a window was to shatter the impact on that
6 guest as well. These are single pane windows. This lodge is
7 old. It's been here forever. It's been in this area since
8 1904, this lodge has been here since 1946.

9 The hatchery is also a concern. The hatchery provides the
10 salmon not only for this area, but like Gary said, for the
11 entire northeast mar -- or northwest market and around the world
12 actually.

13 The drop in altitude to 500 feet above ground level will
14 also impact the hunting for this area as far as I am concerned
15 and it will also impact the industry that we have where we have
16 people coming to stay here and stay at this lodge and in this
17 area and provide business to not only myself but to Myers (ph)
18 Lake and to Mr. Bakewell's Denali Cabins. This area -- I am --
19 I'm for the military training and having the ability to train
20 and to provide these maneuver -- or to do these maneuvers, but I
21 do not believe that the Paxson area is an area that is
22 susceptible to these maneuvers. There's plenty of area to the
23 north. Expand the Yukon River. Yukon River there is little to
24 no inhabitants. I understand that you need the geographical
25 with the mountains and that for your training, but Pax -- the



[illegible]

N0011

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

11 MR. SCHANDELMEIER: John Schandelmeier, S-C-H-A-N-D-E-L-M-
12 E-I-E-R. I'm chair of the.....

13 UNIDENTIFIED MALE: You need to.....

14 MR. SCHANDELMEIER: Did you get it? You didn't get it?

15 UNIDENTIFIED MALE: (Indiscernible).

16 MR. SCHANDELMEIER: S-C-H-A-N-D-E-L-M-E-I-E-R. I'm a
17 Paxson resident, also a resident McClaron (ph) River, Chair of
18 the Paxson Fish and Game Advisory Committee. And my comments
19 are kind of based on this same thing everybody else is here.
20 It's -- low level training is a negative impact for this area,
21 the whole Nelchina Basin actually. It's the highest use
22 recreational area in the interior of Alaska or one of the
23 highest in southcentral I guess it would be if you want to call
24 it southcentral instead of interior. Seems like could have
25 picked a better area, a lot less impact, lot less controversy.

[REDACTED]

N0011

1 The solution I have if you're stuck on this area is no fly
2 zones, 10 mile radius around Paxson, Tangle Lakes, McClaron (ph)
3 River, wherever else is a concern, wherever there's people. If
4 you have the no fly areas around those it seems like that solves
5 a lot of problems as long as you can keep people out of those
6 areas. And that seems to be a concern because right now
7 Paxson's supposed to have aircraft at 18,000 feet and no lower.
8 We certainly do. We have their right on the deck at times. So
9 like to see that -- some -- the way to monitor that, again, is a
10 no fly zone at all, you don't have to worry about it, their
11 altitude. So that's the solution that I see and other than
12 moving the whole MOA out of here and putting it somewhere else
13 where there's less people that's it. Thank you.

N0012

■

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

15 MR. PETERSON: Tony Peterson, P-E-T-E-R-S-O-N. Again, I'd

16 like to enforce that I do support the training of our military,

17 but this area -- John Schandelmeier made a great point with a no

18 fly zone for a 10 mile radius. However, the entire Gulkana (ph)

19 River, Gakona (ph), Gulkana (ph), the entire system that is

20 supported not only by the hatchery but the wild sockeye and, as

21 they said, that they are so fragile for that 120 days out of the

22 year even in the wild stock. That loss would be a magnitude

23 that I could pretty much assume would be unimaginable. It would

24 devastate the commercial fishing, it would devastate the

25 personal fishing and it would devastate the subsistence fishing

■ [REDACTED]