

I0158

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0158	John P. Cook	Dr.	n/a	General (to the EIS), Cultural Resources	<p>I am a retired professional archeologist with considerable experience in Alaska. This is a long and detailed DEIS and incorporates a great deal of information; unfortunately it is not particularly good regarding the treatment of cultural resources. This probably is directly due to the fact that the lead cultural resource writer is unknown to any archeologist in Alaska and has, obviously, little personal knowledge of our archeology. Some more specific comments follow:</p> <p>3.1 FOX 3 MOA EXPANSION AND NEW PAXON MOA (DEFINITIVE)</p> <p>1. "No new construction would be associated with this action." But construction access for the trailers is ground disturbing and, therefore, potentially destructive of archeological sites.</p> <p>2. only the "records of the National Register of Historic Places (National Register) and National Historic Landmarks (NHL)." Is not adequate; there are a large number of unregistered sites within this large expanse of Alaska.</p> <p>3. "Archaeological sites under existing training airspace include Native burial grounds, village and settlement sites, and historic mining sites" No one knows where the "burial grounds" are or even if there are any; the same for "village and settlement sites". This is an example of the lack of knowledge of Alaskan Native settlement patterns.</p> <p>4. The lack of registered properties is directly related to the lack of military activity and recognition of the sites within their jurisdiction. There may (probably are) many such eligible properties.</p> <p>5. "There are no Alaska Native tribes within this area" but the "tribes" did not have prescribed territories and there was considerable use of this area for hunting and trading.</p> <p>6. "Impacts on traditional resources under airspace can include the noise and visual effects of aircraft overflights on rituals and ceremonies" This is nonsense. There are no rituals and ceremonies in these areas, except, perhaps, in the villages. Again, a complete lack of knowledge about the Alaskan situation.</p> <p>7. "Scientific studies of the effects of noise and vibration on historic properties have considered potential impacts on historic buildings, prehistoric structures, archaeological cave/shelter sites, and rock art." There have been no such studies in Alaska; in addition, there are no "cave/shelter sites" or "rock art" in the area considered. This is an unnecessary comment and is plain stupid.</p> <p>8. "The potential for traditional resources in the area was identified using ..." consulted agencies, plans, maps, and staff." This did not include any knowledgeable persons of professional stature. The agencies, etc. are not sufficient to establish the potential of cultural resources.</p>

I0158	<p data-bbox="224 338 261 443">I0158</p> <p data-bbox="272 281 375 1014">9. Aircraft noise—a common factor in this DEIS—is ridiculous when applied to archeological remains and almost so when directed at other historic properties.</p> <p data-bbox="326 306 375 1014">10. "Consultation with potentially affected Alaska Native tribes..." is laughable. There has certainly been no meaningful such consultation.</p> <p data-bbox="380 281 456 1014">11. However, overall, I agree there will probably be "no significant impacts"; more likely—NO impacts of any sort from this particular action, except for the potential trailer construction.</p> <p data-bbox="461 569 482 1014">3.2 REALISTIC LIVE ORDNANCE DELIVERY (DEFINITIVE)</p> <p data-bbox="487 317 563 1014">1. Tanana Flats Training Area: 134 sites have not been evaluated. The land area in northeast DTA in TA 544 and in southwest DTA in TA 533 for the two proposed new target areas has not been surveyed for archaeological resources.</p> <p data-bbox="568 499 589 1014">2. line 31. No such term as "flakestone" in Alaskan archeology</p> <p data-bbox="594 296 777 1014">3. "Archaeological sites under training airspace include Native burial grounds, village and settlement sites..." and historic mining sites" Considering the lack of investigation by any military agency, this is not true. It may be, but considering Native settlement patterns, it is unlikely that any village and/or settlement sites are in the RO(except for short lived hunting camps). "Burial grounds" are, to begin with, a complete misunderstanding of Native burial practices, as well as completely unknown as to locations.</p> <p data-bbox="782 884 803 1014">4. Noise—again</p> <p data-bbox="808 296 911 1014">5. "ALCOM has completed government-to-government consultation with potentially affected Federally recognized tribes, regarding their concerns about potential impacts on Tribal rights..." This has not been properly pursued; a letter was simply sent out; no real consultation was completed.</p> <p data-bbox="915 520 937 1014">3.3 BATTLE AREA COMPLEX RESTRICTED AREA (DEFINITIVE)</p> <p data-bbox="941 281 1073 1014">1. Helicopter training" implies the use of ground cleared spaces—usually by bulldozer—destroying any potential cultural sites. "70 percent of the USARAK helicopter operations" The helicopter pad at the Oklahoma range destroyed what was certainly a Register-eligible archeological site. Similar pads at Clear Creek Buttes involve archeological sites.</p> <p data-bbox="1078 296 1127 1014">2. I have been on the ground within BAX and there are a number of archeological sites that have not been fully evaluated.</p> <p data-bbox="1131 281 1234 1014">3. "Archaeological sites under training airspace include native burial grounds, village and settlement sites, and historic mining sites" and "include structures relating to gold mining, trapping, or the railroad" Within the BAX area, none of this is true, except, maybe, for trapping and gold prospecting. Again, a total lack of knowledge.</p> <p data-bbox="1239 296 1315 1014">4. "One hundred thirty sites are located within the original boundaries of the BAX SDZ (not all sites are eligible for the National Register)." Because they haven't been evaluated.</p> <p data-bbox="1320 317 1369 1014">5. "Rapids Roadhouse, also known as Black Rapids Roadhouse, in Delta." It is NOT in Delta.</p>
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6. "ALCOM has completed government-to-government consultation with potentially affected Federally recognized tribes, regarding their concerns about potential impacts on Tribal rights, Tribal resources or Indian land under the proposed new restricted area." Not in any meaningful way. Several Native leaders and others visited the excavation of a site within the BAX area, indicating a more than superficial interest.

7. "Army is consulting with the Alaska SHPO and potentially affected Alaska Native tribes, ANCSA corporations, and tribal government entities" but not knowledgeable cultural resource specialists within the State.

3.4 EXPAND RESTRICTED AREA R-2205, INCLUDING THE DIGITAL MULTI-PURPOSE TRAINING RANGE (DEFINITIVE)

1. "this action...involves no ground-disturbing construction." But it also says "other than surficial ground disturbance associated with ground maneuvers of vehicles," It is exactly this vehicular traffic that is potentially destructive to shallow deposits of archeological value.

2. It is interesting that some of the oldest and most productive archeological sites in interior Alaska are located immediately adjacent to YTA (Broken Mammoth, Mead, and Swan Point sites). This should make YTA much more sensitive to cultural resource possibilities than is presently the case.

3. Statements regarding noise impacts and Native consultation have been commented upon (and condemned) previously. Programmatic Actions "Prior to implementation of any element of this proposed action, the Army would comply with NHPA Section 106, including identification of historic properties, and assessment and resolution of adverse effects" As long as this is done, there is no present need for comment. The "obsession" with noise impacts on cultural resources is stupid.

Appendix H. Cultural Resources The list of references(N=2)) is laughable. I can only assume that this Appendix has not been finished.

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Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0159	William Theuer	citizen	wrtheuer.co	Purpose/Need, 9 - Joint Air-Ground Integration Complex (JAGIC)	"No Place Else in America" provides the infrastructure and key resources that are available in Alaska. It is among the reasons I support the continued use, renewal and enhancement of our training location and resources. I especially am pleased to learn of the interest in upgrade and priority of technology and cyber component training. I will look forward to the new alignment and utilization of Alaska as a primary training location in the Pacific. very cordially yours, William Theuer Anchorage, Alaska

I0160

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0160	Ward Hurlburt IV	Owner	Forward Services	Purpose/Need, All resource areas, Safety (Airspace), All proposed actions	I recognize you are here to protect us, and need the practice. You already have far more than enough room in our great State of Alaska. Please don't Federalize even more. Years ago I was flying ANC to FAI, came over a ridge before the flats headed north into FAI, and found myself head on with an A10. I jinked to the right, and found myself head on with another A10. If you grab more airspace you will be causing that sort of incident to happen even more between us civilians or civilian on military. By the time you kill a few civilians, you will have lost quite a bit of goodwill you now enjoy in our great State. Your airspace grab is just not worth even one civilian life. Years ago I also watched F4's scorch the tundra, and caribou tails, out in the Naknek MOA. You can still do that with the space you have!

I0161

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0161	Mark Strabel			General (to the EIS), Airspace Management, Noise, Safety (Ground), Physical Resources, Land Use, Infrastructure and Transportation, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I am against the use of the Air Space around the Paxson area, due to the affects it will cause in the Hunting and recreational use of this area. As a side note: Last fall, 2 Air Force jets, along with another Air force cargo plane were flying well below 500ft above ground level, and moved the moose that were in the area that I was hunting in. details, I'm sure can be verified by the Air Force, it was Labor Day week in the West Fork of the MacLearn River.

I0162

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0162	marvin peterson			General (to the EIS), Airspace Management, Noise, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	JPARCS is not good for the Matsu valley. There is already a lot of air traffic in the entire region. The triangle between Anchorage, Fairbanks and Tok is a very busy place for low-level general aviation. The additional low level maneuvering can only increase the risks and when the speeds are factored in, the multiplied chances for a mid-air are increased by a tremendous amount. If these areas are closed for low-level hi-speed military training the negative impact on local use will be substantial. I am an ardent supporter of the military as I have worked in the military or for the military for 40 years. However, there are other options for the military training area. Areas where the local air transport for training, commuting, recreational flying, hunting, fishing and myriad other uses of the airspace are not nearly as busy or widespread. The local wildlife will also undoubtedly be affected in a negative way by the noise and low-level activity of military training. Please reconsider this proposal and relocate the training area to a less densely populated area. The safety and livelihoods of too many Alaskans and tourists to our beautiful region will be adversely affected by the current proposal. Thank you Marvin Peterson Willow, AK

I0163

June 24, 2012

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

To Whom It may Concern:

My family and I strongly oppose the taking of our recreational lands on the highway system for Military training for aircraft . The Federal Government already has control of vast amounts of lands in Alaska and will not let the public use a big percentage of it.

I am not against the military but, let the public have some land to play on too.

Sincerely,


Patrick O'Connor

I0164

From: Barbara Cellarius [REDACTED] on behalf of Barbara Cellarius
Sent: Friday, June 29, 2012 1:12 AM
To: ALCOM J08 Admin Box
Subject: JPARC EIS Comments

(Please find below my comments on the JPARC EIS. I tried to submit them via the website, but received a phone message that there was a problem with my submission. If you could acknowledge that you received my comments this time, I would appreciate it.)

Dear ALCOM Public Affairs:

This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, I support the no action alternative. The proposed actions will negatively impact many residents of Alaska, including but not limited to those living in rural communities in the area. The subsistence impact analysis is seriously flawed and consequently the EIS fails to accurately describe or assess the impact that the proposed actions will have on residents of many rural communities that rely on resources in the Fox 3 MOA (including the proposed expansion) and the proposed Paxon MOA. The mitigation measures proposed for the action alternatives are inadequate and would need to be enhanced if you move forward with an action alternative.

Another reason to reconsider the expansion of the Fox 3 MOA and creation of the Paxon MOA is the ongoing problems with F-22s, which account for a significant number of the proposed flights. Safety issues with these planes need to be resolved before plans are made for expanding their use in military training exercises.

The subsistence analysis for the Fox 3 MOA Expansion and New Paxon MOA is seriously flawed in three substantive areas and should be thoroughly revised before any decision is made to move forward with an action alternative.

First, limiting the subsistence analysis to eight communities within 20 miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and we go to where the resources are. Sometimes that means driving more than 20 miles. For example, I live in Copper Center, one of the rural communities excluded from the analysis, and I pick blueberries every year in the proposed Paxon MOA. I do so because I haven't found a good blueberry patch closer to home. Several of my friends similarly live in communities not included in the analysis, such as Tazlina and Kenny Lake, but hunt caribou in the impact area. Instead of the handful of communities included in the current analysis, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) for moose, caribou or both on lands within Game Management Unit 13 (and any other GMUs that fall within the Fox and Paxon MOAs) under the Federal Subsistence Program. In contrast to the seemingly arbitrary 20 nautical mile rule, customary and traditional use determinations are based on an analysis of all available data regarding patterns of resource use. In what follows, the phrase "potentially affected rural communities" refers to the communities that have C&T for moose or caribou in the MOAs.

Second, twenty plus year old community harvest data is woefully inadequate for making decisions that affect people's livelihoods. (It is clear that your "most representative year" is actually the most recent year for which comprehensive subsistence survey data are available.) As an example, when the community harvest studies were done in the 1980s, local residents could hunt caribou in Unit 11, but now that area is closed to caribou hunting due to conservation concerns and they must now travel to the area of the Fox and Paxon MOAs if they want to hunt caribou. JPARC should follow the lead of the Alaska Gas Pipeline Project and base its analysis on

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updated comprehensive community subsistence data, providing funding to support updated surveys where needed and waiting for the new data where updated surveys are already underway. (The Susitna-Watana Hydroelectric Project is similarly considering the need to conduct updated comprehensive subsistence surveys as part of its planning process.) As a first step, the list of potentially affected rural communities (as discussed above) should be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding should be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information is available for all of the potentially affected rural communities, to allow it to be incorporated into the subsistence impact analysis.

Third, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations is problematic and fails to recognize the importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the "high dependence" category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities where more than about 80 percent of the households report using subsistence resources should be classified as high dependence regardless of the community's composition.

In the event that an action alternative is selected, the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS in order to lessen the significant impacts that these alternatives will have on subsistence activities and resources.

The proposed period for no military flights is not adequate. Short seasons and unpredictable availability of resources in accessible areas mean that it is not realistic to ask local residents to schedule their subsistence activities at times when military activities are not occurring. Instead, military activities need to be scheduled at times that do not conflict with subsistence activities in order to avoid a significant impact on subsistence. Berry picking is an important activity that occurs within late July and August, while moose and caribou seasons in Unit 13 also start in early August. March is another important time for hunting caribou for local residents. There should be no military flying exercises during August, September, and March. In addition, in May, June, July and October, the minimum flight level should be 5,000 AGL to avoid conflicts with general aviation aircraft and subsistence activities during the summer recreation and fall hunting seasons. These restrictions should apply to all branches of the military because it doesn't matter to the wildlife who is flying the plane.

Holding a few community meetings is not adequate to monitor the impact of the proposed activities on subsistence. Another round of comprehensive community harvest assessments should be done approximately five years out, with funding from the federal agencies involved in JPARC, and compared to the information that is currently being collected. Funding should also be provided for surveys to monitor the impacts to wildlife resources. This monitoring could be done in cooperation with federally recognized tribes and other Alaska Native organizations.

The list of communities notified about and consulted with regarding the proposed activities should be expanded to include all those with a positive customary and traditional use determination through the Federal Subsistence Program for moose, caribou, or both, in Game Management Unit 13 and any other GMUs that overlap with the MOAs. For those communities with federally recognized tribal governments, the consultation should occur on a government to government basis.

Thank you for the opportunity to comment.

Sincerely,

I0164

Barbara Cellarius

June 2012

Barbara Cellarius

I0165

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0165	Michael Koskovich	Captain Boeing 747-400	Atlas Air	Cumulative Impacts, All resource areas, Airspace Management, Noise, Safety (Airspace), Land Use, All proposed actions	I very strongly feel that you should NOT extend these MOA's into area's that have road access. There is very limited road access in Alaska. You propose to incinge upon public domain that is used by many citizens for hunting, fishing, snowmachine activity, trapping, mining and other recreational activity. There already exists, thousands of square miles of MOA's that are under utilized. These areas (Stony, Galena, Naknek) have no road access, and are far more suitable for your requirements with significantly less impact on the general populace. As a professional pilot, a recreational pilot and a long time Alaskan, I STRONGLY OBJECT TO THIS PROPOSITION! I know many people in this state, and thus far know of NOT ONE that approves. Michael J. Koskovich

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Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0166	Doyle Ruff			General (to the EIS), Cumulative Impacts, Airspace Management, Safety (Airspace), Socioeconomics, All proposed actions, 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 – Battle Area Complex Restricted Area Addition, 4 – Expansion of R-2205 Restricted Area	The thinking of the USAF leadership for the JPARC proposal is nonsensical. The USAF does not need the expansion under this proposal OR to gain any approval that would force non-military and non-emergency aircraft to a maximum 500' AGL restriction throughout said expansion area. The State of Alaska has dire dependency upon civil aviation, both IFR and VFR, throughout the entire state. The State of Alaska, aviation-wise, is about the civil AND the military side. It is not just about the USAF side. The USAF must compromise on this proposal to an alternative that is acceptable to Alaska civil aviation including the AOPA and Alaska Airmen's Association. Doyle C. Ruff Colonel, USAF (Ret) Former Commander Eielson AFB

I0167

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0167	George Hobson			Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition, 6 - Unmanned Aerial Vehicle (UAV) Access	The lowering of the MOA floor to 500ft. in an area where there is heavy use of general aviation is a big hazard. If there was a continued radio channel like around FAI this would help but not eliminate it because not all small planes have radios. Restrictions around Delta and Isabel Pass are already a problem in poorer weather. Farther restrictions would effectively close the pass most of the time. Allowing UAVs in the crowded airspace around FAI before the FAA comes up with rules of operation and see and be seen is a midair waiting to happen. Please hold off on this till the rules are set or move it all to the Delta controlled area.

I0168

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0168	Gary Wegner	Airman Second Class	None	General (to the EIS), Airspace Management, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 6 - Unmanned Aerial Vehicle (UAV) Access	<p>The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska's fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to over 2,000 of Alaska's general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan's who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft traveling in excess of 500kts and/or 500' would not only endanger civil aviation traffic but destroy Alaska's quintessence. The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic. MOA's today prohibit IFR access by civilian aircraft during exercises. This not only affects the economic viability of communities with and outside of these areas but history shows it has been difficult even obtaining access during emergency situations. This results in an even bigger concern: the loss of safety for VFR operators who are being encouraged to use low-level civil corridors. If larger, IFR capable aircraft are forced to use the VFR corridor during these exercises, this puts these larger, faster aircraft on the same flight path as our smaller general aviation aircraft at low altitude, which is a loss of safety for all civil operators. We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities. Five years ago the Alaska Airmen participated in an EIS process that resulted in the building of the Battle Area Complex south of Delta Junction. One of the concerns at the time was the possibility of restricted air space over the complex. We were assured that this would never be a requirement. Our position has not changed even though the military's planned use of airborne weapons release has changed. We oppose restricted airspace over an area where weather, terrain, and mountain passes creates a challenging and potentially unsafe situation.</p> <p>The proposals to establish more restricted airspace for live ordnance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities. We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training.</p>

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Corridors allowing UAV's to access training areas is an enormous safety concern. Currently the National Airspace System does not have a mechanism that allows UAV's to harmoniously fly and communicate in the same airspace as civil aircraft. Until true sense and avoid capability is defined and developed we need to side with safety and oppose these corridors as proposed. Alaska already has one of the largest areas of airspace in the world secured for training. The Alaska Airmen's Association supports our military and understands the need for training; however we are concerned for other users of this airspace. Through the scoping and public meetings it was explained that the military needed such low altitudes and expanded areas in order to train for existing and future threats to the 5th generation fighters and to train with new weapons systems. It was also stated that this redesign was based on saving transient time and fuel to reach the training areas. While not part of this proposal, we ask the military to look at all Alaska airspace they currently hold and release airspace that is not being effectively utilized. We also question the reasoning and claims for the proposed F-16 move to JBER as they seem to contradict the motives of the JPARC redesign. We do know that improved and consistent communication that includes real-time information for pilots sharing this airspace needs to occur. Implementing a statewide Special Use Airspace Information Systems (SUAIS) as well as improving the existing service are essential to operating an airspace complex of this size. Radio coverage and communication remains unreliable in the eastern areas of the current complex. Beside improvements to the current program, we would like alternatives to be explored for communicating the status of the MOA's improving access in the ranges for civil aircraft when not in use. We ask that the floor of current and proposed airspace be determined based on communication coverage for SUAIS.

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Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0169	Maureen Chambrone			General (to the EIS), Purpose/Need, Cultural Resources, All proposed actions	<p>I have lived in Alaska for 16 years, based primarily out of the Susitna Valley and the Fairbanks area. I am for ABSOLUTELY NO ACTION on ALL of these proposals. We do not need to enhance and modernize the military; if anything, we need to decrease the current military activity which is already too extreme. With a faltering economy, huge national debt, and dwindling resources (e.g. oil) we cannot support the excessive, expensive behavior of the U.S. military. Alaskans need to protect this last frontier we have from further bombardment of excess military activity. Alaska has a special place in Americans' hearts as a last vestige of wilderness, wildlife, and a wild spirit that has gone extinct in the rest of the nation. Alaska is a last vestige of remote wilderness.</p> <p>Wilderness includes air and sound space. Further expansion of military activity does not support the wilderness spirit. The United States military is a cancer that is rapidly sickening our nation, not to mention many other nations such as Iraq and Afghanistan. The military exists only for itself and the mega-corporations that make and sell the weapons, planes, helicopters, tanks, drones, and all the other equipment. It has failed to look out for the American people, to serve as a protector from other potentially aggressive nations. Instead, the U.S. military is beating its chest at the rest of the world and stirring up aggression and further threatening the peace of our own nation, not to mention the peace of the world. Where is this so called advanced weaponry getting us besides making complete fools out of ourselves. The U.S. military drags out every mission they set out to accomplish, kill more innocent people than guilty, make us look as bad, if not worse, than the bad guys we're trying to eliminate. It didn't take an F22 and other modern, enhanced technology to find Saddam Hussein or Osama bin Ladin. It took intelligent courageous men to find them, sneak up on them and arrest or kill them. If the U.S. military wants to increase training and create stressful scenarios for potential wars, then they should get the men off their butts, tear them away from their computer and radar screens, yank them out of their cockpits and plop them down in the middle of the wilderness living with minimal technology and using their senses and working together to become tough courageous men ready to face the potential challenge of other threatening nations and people.</p> <p>Alaska is a prime place for this kind of training, especially joint training. Groups of army, air force, and navy men on their feet traveling through the wilderness working together to solve problems and find the hidden imaginary enemy in a cold dark canyon or in a cave in the mountains. Most of our real life enemies (e.g. Osama bin Ladin) are on the ground using their brains to elude us, not in an F22 like the role playing Red Flag Alaska games. I propose an alternative not listed here. It would save vast amounts of tax payers money. Park all the F22s, F16s, drones, and other technology, but leave just enough in training for defending our country.</p>

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Get the men training jointly on their feet, trekking through swamps and up mountains, create scenarios where men learn to sneak up on enemies, teach them diplomacy, how to defend themselves in hand to hand combat, teach them to use their senses rather than rely on technology, teach them to only kill when absolutely necessary. Maybe then they could tell the difference between innocent civilians and the actual bad guys. They can't do it up in the sky screaming along at hundreds of miles an hour. There's already plenty of technology. The U.S. military should use what it has already wasted taxpayers' money on and not act like a spoiled rich kid having to have the latest newest toy. We can save resources and money by just sticking with what we have. What other countries have this kind of technology? Iraq and Afghanistan sure don't but our technology sure didn't just win the war. Those countries, and the terrorists, use creativity to hold their own against us. As all of the long drawn out wars of the 20th and 21st century have proven (e.g. Vietnam, Iraq, and Afghanistan) more modern enhanced technology never allowed this nation to go in and get the mission accomplished in a short time. With our supreme technology we've just made complete fools out of ourselves. What's missing from this EIS is the effect modernization and the military, in general, have on the spirit of Alaska. This is extremely important. Our airspace should not just be a free for all. You can't have wilderness and so called wild and free rivers on the ground and not include the airspace. Fighter jets flying over the wilderness can completely ruin a person's experience on the ground and affect their sanity. I know from first hand experience being right under the flight path for all fighter jets leaving Eielson. We're down on the ground just living a peaceful life while the aggressive military is training to provoke other nations. Our peace is affected in two ways. In the long term from other countries disgruntled by our cocky country and, immediately, from all the noise. The noise from these jets is excruciating. The stress is intense; it strains relationships. Our quality of life is diminished. We need to promote peace, not war. Peace is cheaper than war.

Alaskans gave the military an inch during World War II when it was rightly justified for defense. But they've taken it miles ever since and turned this state into an aggressive, offensive training grounds. The growth of the military in Alaska along with resource extraction industries, which the military heavily depends upon, has led to a lower quality community in Fairbanks. The so called economic growth that has resulted also resulted in a decrease of local shops and a huge increase in Box Store counter culture. Most old timers will tell you, and many short timers as well, that this place just isn't what it used to be. There's also too much hunting pressure coming from the military who don't even need the meat and there's too many stories of unethical military hunting behavior.

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Expansion of the military in general will result in a further expansion of lower valued people and community. The people who came to Alaska to live a simpler way of life away from the stifling congestion and development of the lower '48 are an important part of Alaska's history and culture even though they may be in the minority. Wilderness and subsistence is an important part of this culture. With the death of wilderness comes the death of a lot of people's spirits. MOAs do not equal wilderness. What little bit of uncluttered, minimally encroached environment that this state has left should be left intact for the benefit of future generations. This includes air and sound space. In these days of ridiculous national debt there is no better time to reduce military technology. Stop giving money to the big multinational corporations making the military technology. Stop using up all of our oil and metals (the extraction of which results in further loss of wilderness) to keep making more modern and enhanced military technology. The military is one of the number one consumers of natural resources such as oil. At the rate we're going we will run out of these resources soon enough. Let's stop now, halt the modernizations, quiet Alaska's air space, let the caribou feed in peace, let the people who came to Alaska for wilderness and subsistence opportunities carry on their peaceful activities, and those who peacefully existed here already for thousands of years continue to do so. Please, absolutely NO ACTION on all proposals. Alaska is a prime place for this kind of training, especially joint training. Groups of army, air force, and navy men on their feet traveling through the wilderness working together to solve problems and find the hidden imaginary enemy in a cold dark canyon or in a cave in the mountains. Most of our real life enemies (e.g. Osama bin Ladin) are on the ground using their brains to elude us, not in an F22 like the role playing Red Flag Alaska games. I propose an alternative not listed here. It would save vast amounts of tax payers money. Park all the F22s, F16s, drones, and other technology, but leave just enough in training for defending our country.

Get the men training jointly on their feet, trekking through swamps and up mountains, create scenarios where men learn to sneak up on enemies, teach them diplomacy, how to defend themselves in hand to hand combat, teach them to use their senses rather than rely on technology, teach them to only kill when absolutely necessary. Maybe then they could tell the difference between innocent civilians and the actual bad guys. They can't do it up in the sky screaming along at hundreds of miles an hour. There's already plenty of technology. The U.S. military should use what it has already wasted taxpayers' money on and not act like a spoiled rich kid having to have the latest newest toy. We can save resources and money by just sticking with what we have. What other countries have this kind of technology? Iraq and Afghanistan sure don't but our technology sure didn't just win the war.

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Those countries, and the terrorists, use creativity to hold their own against us. As all of the long drawn out wars of the 20th and 21st century have proven (e.g. Vietnam, Iraq, and Afghanistan) more modern enhanced technology never allowed this nation to go in and get the mission accomplished in a short time. With our supreme technology we've just made complete fools out of ourselves. What's missing from this EIS is the effect modernization and the military, in general, have on the spirit of Alaska. This is extremely important. Our airspace should not just be a free for all. You can't have wilderness and so called wild and free rivers on the ground and not include the airspace. Fighter jets flying over the wilderness can completely ruin a person's experience on the ground and affect their sanity. I know from first hand experience being right under the flight path for all fighter jets leaving Eielson. We're down on the ground just living a peaceful life while the aggressive military is training to provoke other nations. Our peace is affected in two ways.

In the long-term from other countries disgruntled by our cocky country and, immediately, from all the noise. The noise from these jets is excruciating. The stress is intense; it strains relationships. Our quality of life is diminished. We need to promote peace, not war. Peace is cheaper than war. Alaskans gave the military an inch during World War II when it was rightly justified for defense. But they've taken it miles ever since and turned this state into an aggressive, offensive training grounds. The growth of the military in Alaska along with resource extraction industries, which the military heavily depends upon, has led to a lower quality community in Fairbanks. The so called economic growth that has resulted also resulted in a decrease of local shops and a huge increase in Box Store counterculture. Most old timers will tell you, and many short timers as well, that this place just isn't what it used to be. There's also too much hunting pressure coming from the military who don't even need the meat and there's too many stories of unethical military hunting behavior. Expansion of the military in general will result in a further expansion of lower valued people and community. The people who came to Alaska to live a simpler way of life away from the stifling congestion and development of the lower '48 are an important part of Alaska's history and culture even though they may be in the minority. Wilderness and subsistence is an important part of this culture. With the death of wilderness comes the death of a lot of people's spirits. MOAS do not equal wilderness. What little bit of uncluttered, minimally encroached environment that this state has left should be left intact for the benefit of future generations. This includes air and sound space. In these days of ridiculous national debt there is no better time to reduce military technology. Stop giving money to the big multinational corporations making the military technology. Stop using up all of our oil and metals (the extraction of which results in further loss of wilderness) to keep making more modern and enhanced military technology.

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I0169

I0170

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0170	Becky Schwanke			Cumulative Impacts, Airspace Management, Safety (Airspace), Biological Resources, Land Use, Socioeconomics, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Thank you for the opportunity to comment on this DEIS. The review thus far has failed to effectively describe the impact on the incredible number of users in this extremely popular year-round recreational area. Leaving the Paxon area as is, and leaving the Fox 3 MOA above 5000 ft. is the only viable, realistic, safe option. Saving fuel so that the joint bases can train in the Nelchina-Oshetna-Lake Louise-Gulkana-Paxon-Denali Highway region is absolutely ludicrous and should never have been recognized as a valid rationale for the proposed changes listed in the DEIS. The wildlife resources in this area provide valuable subsistence and socioeconomic opportunities to over 10,000 Alaskan hunters and gatherers each year. The extensive trail system in Game Management Unit 13 is testament to this fact - the EIS must consider this extensive system in order to fully grasp the extent of the summer and fall use. The waterways provide additional summer transportation, as well as snow in winter. The trapping, fishing, and hunting interest in this area is unparalleled in the state, and this area is so popular for the very reason JPARC is interested - it's in the middle of the 2 largest urban areas of the state. Pilots look down and see trees and water, we all look up and see and hear pilots training all year. At this point the existing Fox 3 MOA is compatible with area uses and has no effect on the wildlife resources. With a 500ft ceiling, the aerial wildlife monitoring in this area will be seriously impacted, and without the highest quality data, subsistence opportunities will be curtailed for the sake of conservative management. That's what happens when biologists don't have the best quality data - subsistence harvest opportunities will be cut drastically. The DEIS failed to acknowledge this. The Nelchina Caribou herd as well as moose in the Nelchina-Copper river basins are managed under the state's intensive management law, meaning the harvest must be maximized annually for the benefit of Alaskan subsistence hunters. The state has thus far done an excellent job bringing these populations back up to the point where they can sustain the incredible hunting pressure from Anchorage, the valley, and Fairbanks, among others. Expanding the Fox 3 MOA and establishing a Paxon MOA would have detrimental effects on the monitoring as well as the use of these wildlife resources. While monitoring occurs from May - November (daily or weekly depending on the season), hunting occurs throughout August, September, after October 21st, November-March. There is no avoiding the critical management or harvest periods. There are simply too many people reliant on these resources to risk them by bringing in joint military training missions. Maintaining the safety of our biologists, hunters, and other locals and recreational flyers was sorely missed in the DEIS.</p>

I0170

You obviously are not aware of all the time periods when people are out there flying in small fixed wing aircraft. First thing in the spring March-April there are considerable numbers of people flying out to their recreational cabins. There are also a number of pilots out pursuing furbearers and wolves in the area, and following tracks from a fixed-wing makes these small planes extra vulnerable to impact and wake turbulence from the large fast flying jet aircraft. From April-May pilots are out tracking bears for later pursuit by hunters as well as for biologists attempting population estimates. In May moose and caribou are surveyed for parturition (calving), a very important piece of data for sustainable wildlife management. In June and July the Nelchina Caribou Herd must be counted annually – it is extremely weather dependent and usually occurs from 25 June – 10 July. This count entails using 3-5 small fixed wing aircraft covering the eastern Talkeetna mountain foothills counting caribou all day, followed by a composition flight in a small helicopter. Sheep surveys occur throughout June and July, weather dependent. Hunting starts August 1st for federal moose and caribou hunters, and the caribou hunting season runs through the end of March. Trapping ramps up November and runs through February – many are on snowmachine but many use small aircraft. Recreational snowmachine riding ramps up from February-April, during the same time that biologists are flying snow surveys in small aircraft. There simply is no good time for large numbers of jet aircraft to be flying around in this region at 500 ft. period. You will kill somebody, then it will probably happen again. It could be me – I spend a tremendous amount of my time in small aircraft throughout the Nelchina-Copper River basin year-round. The actual effects on wildlife are yet to be determined regardless of how many short jet-overflight studies the AK military has funded. The short term overflight studies of caribou and sheep during random periods has no bearing on the reality that the proposed 500ft ceiling in these MOAs will cover the calving grounds of the Nelchina Caribou Herd (the heaviest harvest of any Alaskan caribou herd) and substantial Dall's sheep habitat in the eastern Talkeetna and Chulitna Mountains. Overflights for a week or more during training exercises, especially as jets have gotten larger and louder than all past Alaskan overflight studies, will severely curtail the effectiveness of caribou and sheep to graze and evade predation.

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Caribou and sheep do not like continuous disturbances, read S. Wolfe's M.S. thesis from UAF per the shift of the Central Arctic Caribou Herd following establishment of Prudhoe Bay. That herd was lucky - they had adjacent areas that they could move to that were of equally high quality. The Nelchina Caribou herd has no adjacent high quality habitat to move to. If JPARC training missions occur over their calving areas at 500', we can be guaranteed the Nelchina Herd will abandon their preferred calving range. The reality is this isn't a short 1-2 week period the military can avoid - caribou remain on their calving range for up to 2 months during summer.

When they shift away from this preferred area in the foothills of the Talkeetna mountains, you will see increased mortality on calves just as the Porcupine Herd saw in years they calved adjacent to their preferred calving grounds in the 10-02 area on the north slope. We have a fantastic management program in place for Nelchina Caribou, having harvested over 50,000 caribou from the herd in the last 25 years. The military will not fare well with the weight of destroying the productivity of the Nelchina Caribou Herd on its shoulders. It is not a matter of if this will happen, it's a matter of when, how soon after the jets start training here. If this is the price to pay for training cost savings, I have severely misjudged our Alaskan military. Do the right thing, use Stony River, or develop a different area out west or up north for use for low level mountainous training. This area is already too well developed and sustains a tremendous subsistence and socioeconomic benefit to Alaskans - a lower ceiling in this area is a death sentence to the basin as well as to the first few people that get killed. Sincerely, Becky Schwanke

I0170

I0171

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0171	Michael Raffaeli			General (to the EIS), Purpose/Need, All resource areas, Airspace Management, Noise, Physical Resources, Water Resources, HAZMAT, Biological Resources, Cultural Resources, Land Use, Infrastructure and Transportation, Environmental Justice, Air Quality, All proposed actions	The no action alternative should be chosen. Do not turn Alaska's landscape, the last surviving continuous wild lands in America into a training ground. Wild and Scenic Rivers have been already designated and the power to maintain the qualities of wild lands should be adhered to. Recreation, hiking, canoeing, river rafting, hunting, and fishing are why people come (and stay) in Alaska- these resources need to be maintained and foster pride and patriotism in America. There is not enough oversight in these proposed actions to protect the biological, physical, and cultural resources- clean water, wildlife (especially bird populations and migrations), solitude, quiet, open lands that we as Americans are allowed to access without restrictions from the military- that Alaskans value, that I as an Alaskan value. I do not want to give our military a larger blank admission to ruin America's greatest legacy- our land.

I0172

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0172	Miranda Terwilliger			General (to the EIS), Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, Mitigations, All resource areas, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Dear ALCOM Public Affairs: This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, we support the no action alternative. The proposed actions will negatively affect many Alaskans, rural and urban who use this popular area for subsistence and recreation. We feel that the analyses created for this EIS are both flawed and dated. Much of the data does not really include all of the communities impacted by this area - for example we are subsistence berry pickers and caribou/ moose hunters in the area as are many in our community but it, Copper Center, was not included. We also recreate in the area in the summer, enjoying wildlife watching and camping. Such experiences have been badly disrupted by a passing helicopter, we can only imagine the impact of low flying military aircraft. The subsistence data used is particularly appallingly data given the data used in several similar EIS's that are ongoing in the area (the Suisna Dam and the Alyeska Gas Pipeline Project). These projects paid for the collection of the data that was missing. It seems that the federal government who holds those other projects to such standards should do no less. Friends of ours as far as Fairbanks and Anchorage are active users of the area as well and it is one of the more popular tourist areas. This aspect was not addressed in the EIS. In the event that an action alternative is selected the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS to properly address the impacts to subsistence activities and resources as well as wildlife and recreation and a substantial monitoring program needs to be in place to insure that the mitigation measures are successful. In particular we think it is unreasonable for subsistence activities to be adjusted around flight schedules when they involve uncertain and differentially distributed resources. Thank you for the opportunity to comment. Sincerely, Miranda Terwilliger & Todd Stoeberl July 2012</p>

I0173

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0173	Jennifer Raffaeli			General (to the EIS), All resource areas, All proposed actions	Please choose the No Action alternative. There is too much at stake if we open these lands to military training. The benefits do NOT outweigh the potential risks and losses at stake in terms of the value of these lands as natural resources, wildlife habitat, places to enjoy wild and scenic rivers, solitude and freedom. The military does not have an effective means in place to mitigate the impacts that their training exercises would have on these lands and the animals and people that depend on them.

I0174

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0174	Patrick Shier	Owner Member	9295 Tango LLC	General (to the EIS), Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition , 4 - Expansion of R-2205 Restricted Area , 6 - Unmanned Aerial Vehicle (UAV) Access	Thank you for the opportunity to comment. I often fly a private single engine seaplane in proximity to various MOAs as I transit from Southeast Alaska to the interior, between Fairbanks and Glennallen, and west of Anchorage to and from a remote cabin on Telaquana Lake. I appreciate the value of the unique training opportunities presented by the wide open space found in Alaska. I also appreciate the positive economic impact of exercises held in these locations. I would ask the planners to consider raising the floor of areas adjacent to transit areas, mineral developments, and common recreation routes, particularly in the summer months. Raising the floor to something like 2000ft AGL would create less congested VFR corridors, reduce the risk of in flight collisions, and retain safe access to covered locations. Thank you.

I0175

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0175	Brian Napier			General (to the EIS), Noise, Biological Resources, Land Use, Socioeconomics, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	<p>To whom it may concern, I am writing to express that I prefer the no action alternative for the JPARC Modernization and Enhancement EIS. As a resident of the Denali Borough I live, recreate and subsist off of the lands in and adjacent to the proposed JPARC expansion. I am particularly concerned with the Fox MOA and the Paxson MOA proposals. The Bureau of Land Management (BLM) considers the area, included in the Fox and Paxson MOA, "A historic glimpse into the Last Frontier-wilderness in all directions." The BLM also, describes the Tangle Lakes area within the possible Fox MOA expansion, as a place to imagine and appreciate the past, and also a wonderland for outdoor activities. The EIS for the JPARC expansion suggests that the JPARC will not interfere with other agency functions or missions in the lands possibly added in an expansion. I see little in the way of compatibility between a MOA and a Wild and Scenic River, such as the Gulkana River a BLM managed site, even if the sound intrusion will only occur for approximately 60 days. The JPARC EIS is obviously very comprehensive in scope and depth. I appreciate that there is a lot of time and attention that has been paid to this proposed expansion. However, in regards to possible wildlife impacts, such as sheep nurseries, caribou calving grounds, migratory bird breeding grounds and stopover sites, there are no monitoring standards or plans in the EIS for assuring that wildlife are not adversely affected by sound intrusions and increased air traffic. By not having critical indicators, such as mortality and reproductive rates, identified in the EIS there is no immediate accountability by JPARC for changes in wildlife populations in the JPARC expansion. Simply stating that JPARC will avoid calving grounds, sheep nurseries, and bird migratory routes, leaves too much room for interpretation and lack of accountability in the end for negative impacts. Similarly, I have concerns that JPARC has discounted the recreational community and tourism industry that uses the areas in the Fox and Paxson MOA. As stated above, there is little in the way of compatibility in a wildland being considered for heavier military use and destination for outdoor enthusiast, recreational hunters, subsistence users, just to name a few.</p> <p>While the JPARC EIS considered sound and social impacts from sonic booms and sound intrusions, it picks sound levels based on urban areas and seemingly brushes off social impacts as annoyances. Similar to the disappearance of stars from the night sky in urban areas due to light pollution, the disappearance of a wild landscape is closely behind the night sky. A wild soundscape is a precious resource and one many residents and visitors to the State of Alaska experience and should be able to experience on for years to come. I appreciate that the military is attempting to create a more energy efficient and realistic training ground through the JPARC expansion in order to meet operational goals and environmental standards.</p>

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However, the areas identified for heavier training use and other newly added lands are more than just maneuvering grounds. They are wildlands for recreation and rejuvenations a dwindling resource, the world over. The lands proposed for addition to JPARC are important breeding grounds for wildlife, they are peoples homes and subsistence livelihoods. Additionally third behind, commercial fishing and oil and gas industry, tourism is an economic engine for many of the areas included in the Fox and Paxson MOA, including Tangle Lakes, Gulkana Wild and Scenic River, McClaren River to name a few. The dollars spent in the surrounding communities and the communities servicing travel to these destinations greatly benefit and rely on this very important renewable resource. Thank you for your time. Sincerely Brian Napier Denali Borough Resident

Resident

I0176

[REDACTED]

From: CANFIELD, MIKAL R MSgt USAF ALCOM JTF AK/J08
Sent: Monday, July 09, 2012 5:29 PM
To: ALCOM J08 Admin Box
Subject: JPARC Comment

Rex Gray, Palmer

[REDACTED]

I am a general aviation and professional pilot in Alaska for 37 years and I have a son who flies in the military in Alaska and I oppose the expansion of the Fox 3 and Paxon MOA due to safety concerns for mid-air hazards with general aviation users. These areas have high-density general aviation traffic. As a professional airline pilot utilizing Alaska's airspace, I'm extremely concerned about the potential hazards of the UAV corridors near Fairbanks. These corridors have the potential to have a significant safety impact on my job as an airline pilot.

I0177

[REDACTED]

From: SMITH, RANDALL A WS-06 USAF PACAF 354 CES/CEOIC
Sent: Friday, June 29, 2012 11:48 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

I and many others have cabins on the Wood River, to get to it I fly from North Pole and skirt around the Blair MOA; I see in the Proposed Action-6 they want to add an Unmanned aircraft training corridor; my question is if this corridor is hot will I have to go around it or under it? If yes to go around it t not under it then I have to fly all the way around Fairbanks and up the Wood River taking more than double/triple the time and fuel. If I can go under it no problem. There are many of us that use this route to get to our cabin and many commercial outfits flying this route to Gold King, mining operations and guided hunting camps. This is a very busy section on a daily basis! The impact on our operations will become very expensive to us and to customers of the commercial folks.

Is there a document that explains what the impact to us would be if this passes?

Randy

[REDACTED]

I0178

From: [REDACTED]
Sent: Friday, June 29, 2012 1:38 PM
To: ALCOM J08 Admin Box
Subject: JAPARC-EIS Comments re: proposed expansion of Fox 3 MOA
Attachments: 2nd Letter to oppose JPARC expansion.doc

The attached letter has my comments. I support NO ACTION on the proposed expansion of the Fox 3 MOA. It should remain as it is.

Cathy Teich

I0178


6-29-12

To Whom It May Concern:

RE: Expansion of Joint Pacific Alaska Range Complex
(Fox 3 expansion, the new Paxon MOA, the lowering of
the MOA to 500 feet AGL)

After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.

The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. Caribou are migratory, which means that they move around. They move around through the entire area.

There are countless air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would endanger these pilots, their aircrafts, and their passengers. The speed at which military aircraft fly would be a lethal combination with slow flying Super Cubs, 185's, Beavers, and Otters. The November 16, 2010 F-22 Raptor crash is an example of things gone wrong. With more low flying high speed aircraft in the area with slow flying aircraft, the odds are even greater for accidents.

In addition to this hazard, this same region is a major hunting, camping, berry picking, and recreational area. It is a huge area for wildlife, especially being a caribou migration/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds here. I cannot imagine the damage to waterfowl with jets going over at 500 feet AGL. It would be devastating. Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. This would infringe upon the rights of Alaskans. Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.

The following site reviews the results of studies that indicate that military aircraft have adverse affects on wildlife:

<http://www.nonoise.org/library/fctsheets/wildlife.htm>

I0178

The result of these studies indicated that the calving of wildlife with this type of noise pollution was adversely affected.

I am a speech/language pathologist and have taken audiology courses. Jets flying over at 500 feet AGL are **loud**...to the point of damaging hearing. The following link has a table of noise levels starting on page 2:

<http://www.musicmotion.com/content/mim/pdfs/noise%20and%20hearing.pdf> Page 3 indicates that noises of 80 dB or greater are potentially dangerous to hearing. Page 4 indicates that noise not only affects hearing, but other things:

- Increases blood pressure
- Has negative cardiovascular effects such as changing the way the heart beats
- Increases breathing rate
- Disturbs digestion
- Can cause an upset stomach or ulcer
- Can negatively impact a developing fetus, perhaps contributing to premature birth □
- Makes it difficult to sleep, even after the noise stops
- Intensifies the effects of factors like drugs, alcohol, aging and carbon monoxide

All mammals would be similarly affected (see <http://www.nonoise.org/library/fctsheets/wildlife.htm>).

Before any changes could be made in the FOX MOA, you really need to have baseline data for the current populations of wildlife and their behaviors/patterns (feeding, calving, birthing, raising their young, nesting, migrating, watering, routines, etc.) in order to have data to compare after a change is made...although I don't think you should make any changes in the current FOX MOA. It should remain as it is. ADFG should be included in studies (funded by the military) in order to obtain accurate information about wildlife behavior/habitat.

Some friends of mine were hiking off of the Denali Highway this spring and experienced 2 triple sonic booms that made them hit the deck. This is not a pleasant experience when you are hiking in a "quiet" environment, enjoying solitude and wildlife. Recreation in the area of the FOX MOA is ongoing most of the year: fall: hunting and berry picking, photography; winter: snow machining in some areas and hunting (if season allows), caribou are scratching out food and trying to make it...they certainly don't need any more pressure; spring: snow machining in some areas, snowshoeing, skiing, and photography; summer: hiking, bird watching, biking, camping and photography.

According to: <http://www.cannon.af.mil/shared/media/document/AFD-110909-039.pdf> 3-12, the sound of an F16 at 500 ft. AGL at 500 KIAS is 102 dB (harmful to human hearing...wildlife have more sensitive hearing). A C-130 flying at 220 KIAS makes a sound at 95 dB (also harmful to human hearing...wildlife have more sensitive hearing).


According to: <http://www.globalsecurity.org/military/library/report/enviro/F22DraftEis/volume1/Mountai>

I0178

[n Home AFB/MH3.pdf](#) page MH3-15, F 22 flying at 500 feet AGL at an airspeed of 520 would generate 114 dB of sound. This, again is damaging to human (and wildlife) hearing. It is not natural and would interfere w/calving and the development of young wildlife and waterfowl/migratory birds.

I completely oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL). There should be No Action. It should be left as it is.

Sincerely,

Cathy Teich


I0179

From: Denis Ransy [REDACTED]
Sent: Thursday, July 05, 2012 5:05 PM
To: ALCOM J08 Admin Box
Subject: Public comment-draft EIS
Attachments: D.RANSY JPARC Comments.doc

Please acknowledge that you have received my comments.

Thank you.

Denis Ransy

I0179

COMMENTS ON DRAFT EIS FOR MODERNIZATION AND ENHANCEMENT OF JPARC

7/5/12

I AM FOR THE NO ACTION ALTERNATIVE.

I oppose all of the proposed expansion of, and creation of new Military Operation Areas, Training Areas, corridors, access roads, JAGIC and JPADS.

The vast existing areas are more than adequate for all training purposes. It has not been proven otherwise. The expansion would be a military take-over of huge amounts of our public lands and a hazard to private landowners. These Alaskan public lands provide dozens of uses for thousands of peoples' necessary activities including subsistence, commercial, and recreational uses. People do not want to be confronted with war games and "live fire" when hunting, fishing, trapping, camping, exploring, and all our other outdoor activities. Certainly 500 feet AGL supersonic flights daily are unacceptable and will have noise impacts outside the boundaries of the MOA's.

Problems with military exercises are as follows:


- Dumping of aircraft fuel in many flight situations
- Danger of live ammo and unexploded ordnance
- Unwanted new roads, heli-pads, and airstrips
- Litter, human waste, and aircraft chaff
- Extremely low flight altitudes

In addition, the military has a very poor track record with toxics and abandoned drums of used oil and contaminated fuel.

Much of the areas you want to take over are undeveloped or lightly developed country, and it should remain as such. This is essentially a large development project. It would negatively impact wildlife, fish, water quality, homes, cabins and lodges. The noise of these operations alone would be extremely disturbing to both humans and animals.

We do not need "more military infrastructure" or a "larger military industrial complex". The present enormous areas now open to the military, both on and off bases, are more than adequate for all training purposes.

Your draft EIS needs to consider the proposed Susitna Dam in its cumulative impacts.

Denis Ransy


I0180

From: Ron Smith [REDACTED]
Sent: Saturday, July 07, 2012 12:13 PM
To: ALCOM J08 Admin Box
Subject: Airspace

As a private pilot using this airspace it would negatively affect my ability to use my airplane for basic transportation. Please reconsider.

I0181

From: Michael Riddles [REDACTED]
Sent: Monday, July 09, 2012 1:14 PM
To: ALCOM J08 Admin Box
Cc: [REDACTED]
Subject: JPARC

Concerning proposed airspace changes:

I am a VFR user of several of these areas and have the following GRAVE concerns for all general aviation users, as noted below by the Alaska Airmen's Association:

- **The proposed Fox 3 MOA additions** extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities.
- **The low-altitude portion of the proposed Paxson MOA** includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.
- Under current FAA rules, **active MOAs block access by IFR aircraft**, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.
- **The military constructed the Battle Area Complex** south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex.
- **Restricted areas west of Delta** (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.

I am entirely in agreement with the above statement.

While I support our military and the need to conduct training to remain the world's unsurpassed air superiority force, this appears to be an excessive appropriation of airspace that is used by many, and I oppose it; this will severely curtail my enjoyment and rightful use of these areas.

Regards;

Mike Riddles

I0182

From: matt obermiller [REDACTED]
Sent: Monday, July 09, 2012 3:55 PM
To: ALCOM J08 Admin Box

To Whom It May Concern,

I have been a full time resident of the Copper Basin since 1996.

I use the Paxon/Tangle Lakes area as a source of subsistence meat and for recreation. All your proposed usage expansions would negatively impact my and most all other users of this area and I am strongly opposed to any of your proposed expansions.

All your expansions would very likely have strong negatively impacts on the animals, people (Copper Valley residents and visitors) and businesses that depend on this area.

Per information in your presentation at the Caribou Hotel in Glennallen winter 2010, was the fact that, although you already have 65,000 square miles of every type of terrain Alaska has to offer to play in, in which you for some reason can't find precisely the conditions you want, you want to grab up to another 10-11,000 acres of our state with out relinquishing any of the areas you already have. Are you already fully utilizing all the areas you already have to train in? When will you have enough? I strongly object to this both as an american citizen and as an alaskan.

Also brought up at this same presentation: one of the principle benefits of any of the expansions is convenience and fuel savings, the expansion area being equidistant and between two air force bases. The aggressor team can fly from one base, the defender team from the other and meet in the middle, over our high quality subsistence hunting and recreating area. Your convenience is not a good enough reason to offset the harm you will do to me and so many of us.

The users your activities force out of the expansion areas will not go away, they will pile up in other already over-taxed areas in the valley. Many of us resident subsistence users are already having a hard time getting by. Any of your expansions will bring in even more competition for already tight hunting and fishing resources. My reality is, if I don't kill a moose, caribou or bear every year, I don't get to eat meat for the next year. I become an involuntary vegetarian with all the health ramifications that entails. End of story. A lot of us in this valley are in the same boat. Grocery stores are few and far between, cash is hard to come by and if we have to buy our meat, we have to do without something else.

You already have a staggering amount of very diverse terrain in which to very adequately do the training you want to do and it sounds like you are not coming anywhere close to using what you already have, yet you want a great deal more.

Your main real gain appears to be convenience, a little fuel savings and perhaps a brief respite from the boredom of training on grounds you have trained on before. The very real life cost to the animal and human residents and users of this area is way too great to be justified by your small gain of convenience and fuel savings. Please don't enact any of the proposed expansions.

Respectfully, Matt Obermiller
[REDACTED]

I0183

[REDACTED]

From: [REDACTED]
Sent: Monday, July 09, 2012 5:21 PM
To: ALCOM J08 Admin Box
Subject: JPARC Comments
Attachments: JPARC COMMENTS.docx

Good day
i have attached my comments concerning JPARC.
thanks al

I0183

Allen F. Barrette

[REDACTED]

[REDACTED]

[REDACTED]

Re: Realistic Live Ordnance Delivery.(Blair Lakes and Donnelly Training Area)

My comments are pertaining to the State land in Proposal 2, Realistic Live Ordnance Delivery Area, proposed restricted area.

I do not support any restriction to access to State lands and or closing of State land to Alaskans to further training of our valued Armed Forces.

Alaska has very well written and interruption though the Alaskan Supreme Court a Constitution.

The Alaskan Constitution Article 8, the Natural Resource article grants Alaskans many protections and guarantees. Sections 1-4, and 13, 14, and 16 point out my concerns and you should be aware of them.

I also don't believe the EIS addressed the economical and recreational value of the possible 305,000 acres of State land that could have access restrictions levied on it.

This area is highly valued and used by many Alaskans to gather their wild food resources on annual bases. Even though the EIS made note of State or privet airstrips, it did not consider the many Super Cub type airstrips that are used.(these are not noted on any maps, but they exist) The same is true of many traditional hunt camps.

I did not see in the EIS the possible loss of income from all the guides that are registered to provide guided hunts for this area. With only a minimum of 2 week notice for exercises, how does one book guided hunts, and fulfill contracts with clients if they cannot be in the field? What about air transporters. How will the anticipated 90 to 150 days use by the military effect their businesses? The same could be asked of the miners.

Trapper is this area will also be economically affected. If trappers are restricted from being in the area the result could be loss of reasonable opportunity to harvest furbearers, loss of furbearers being in the trap to long, furbearers having to be in traps long than what is reasonably expected. Maintaining a trap line has social, moral and ethical components to it also.

Note: Trapping season is November – April.

Even though this is not a State designated Subsistence area (by definition) many Alaskans use it as such, they treat the wild food they gather as a necessity for life. The 305,000 acres and predicted 90 to 150 days of use by the military would have a great impact on those who rely on those resources. Moose in this area are managed under State intensive Management (IM) practices. This means "high levels of human harvest" restricting this area at any time during September-November would impact the IM plan.

I0183

Sheep, caribou, bears are not designated as IM, but many Alaskans do pursue them as a valuable wild food source and some consider them as somewhat of a trophy. The taking of sheep and caribou happens August through September. Black bears have a "no closed" season but the majority of the bears are harvested during the months of June and August and September. Grizzly bears are harvest in the months May and April, and the gain in September till they go into the den sometime mid to late October.

So it is very hard for me to see how Alaskan could co-exist with this current proposal on State land, and not impact us greatly.

To put in some sort of perspective Alaska only has control of 33% of land within the State. You the Federal Government have the rest.

NOTES: I find it somewhat odd that the U.S. Military's EIS on aircraft noise has little effect on game population and their movements. Also that aircraft noise does not affect the values of a person's wilderness experience. Yet the National Park Service, Bureau of Land Management, National Petroleum Reserve-Alaska, National Wildlife Refuge and the National Forest and Conservation Areas all say and have made policies or regulations or are in the process of doing so, to make restrictions on aircraft use with in their jurisdictions.

Who is correct about aircraft noise, and how it affects game and wilderness values? Is the State of Alaska and the JPARC EIS correct, or are all the other Federal Agency correct?

RECOMMENDATION:

Is to not allow any live ordnance release over State controlled land that would restrict access to those lands.

Thank you for allowing me comment.

Al Barrette

I0184

From: [REDACTED]
Sent: Monday, July 09, 2012 5:42 PM
To: ALCOM J08 Admin Box
Cc: Gayle
Subject: comments on JPARC draft EIS
Attachments: JPARC comments 7.12.doc

To whom it may concern:
Attached please find our comments on the alternatives outlined in the JPARC draft EIS.
Please confirm receipt of these comments.
Thank you.
Helen and Gayle Nienhueser

I0184

Helen and Gayle Nienhueser



July 9, 2012

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

Via e mail: alcom.j08@elmendorf.af.mil

RE: Comments on JPARC Modernization and Enhancement draft EIS

To Whom It May concern:

We are writing in support of the No Action Alternative. We are opposed to both the expansion of the Fox 3 MOA and lowering the altitude to 500 feet. This is the only alternative that would neither expand Fox 3 MOA nor allow training exercises below 5000 feet.

Though many of our concerns would apply to the Paxson MOA as well, we are less familiar with that area. Our family spends a great deal of time in the Matanuska-Susitna Borough where we have three cabins and therefore will focus our comments on the Fox 3 MOA. One of our cabins is south of Denali State Park and west of the Susitna River and is already impacted negatively by the MOA west of the Susitna even though it is not directly under it. The others are located in the southern part of the Talkeetnas, generally in the areas known as Chickaloon and Glacier View. Both of these would be negatively impacted by the expansion of Fox 3 MOA.

The reason for having and using these cabins is the opportunity they provide for experiencing Alaska's wilderness—the reason we live in Alaska. One of the most important qualities of that wilderness, increasingly rare in today's world, is natural sounds only. The continual roar of airplanes over Anchorage as I write is very disruptive and unpleasant—and makes the qualities of peace and quiet provided by our cabins all the more important. Among other things we value our cabins for the good night's sleep we get there.

Another concern is the impact on wildlife, also one of the important values of the Talkeetna Mountains. We know that ADF&G has already provided information to you regarding the negative impacts to wildlife from the noise of training flights, particularly those at low altitude. We also know that these training flights will sometimes break the sound barrier, impacting the health and well being of both humans and wildlife. One of our cabins is within the range of the Nelchina caribou herd. Being surrounded by caribou, having wolves answer our howls, watching Dall sheep traverse the mountain slopes or raptors soaring above us are among the highlights of our lives. These populations will likely be reduced or displaced by the disruptive noise impacts of military

I0184

training flights. We share the concerns of the Lake Louise residents/property owners who are not far from us.

Other concerns are restrictions on on-the-ground use and air space use by other aircraft. Getting out into Alaska's back country is a major component of many Alaskans lives. Either we already live there or we depend on being able to go there for recreation, hunting, fishing, hiking, mining, climbing, ORV trips, wildlife-viewing, camping, berry picking, connecting with the "real" Alaska, peace, silence, solitude. It's why we live here. Many of us use small planes to get to these places. For many of us, our windows of opportunity to do these things are restricted either by our own schedules or by the seasons. If you were to close some of these areas during someone's particular window of opportunity it may mean not using the area at all. This is a major and unacceptable infringement on our freedom to enjoy living in Alaska. The Talkeetnas have become Alaskans playground and should remain so.

In addition, smaller airlines offering scheduled service to small villages may face long and expensive detours. This will have negative economic impacts on their businesses. As well, there will be negative economic impacts on charter aircraft businesses.

One further comment: there is a rumor that this expansion of MOAs is related to the proposal to transfer F16s to Anchorage from the Fairbanks area. If true, the simple solution is to keep the F16s in the Fairbanks area and select the no action alternative in the JPARC draft EIS. Anchorage does not need or want those F16s here, appreciably adding to our already high urban noise level. Fairbanks does want them because of the jobs they provide there and their training areas are far enough away from urban centers that they are not a problem, as we understand it.

Thank you for the opportunity to comment.

Sincerely,
Helen and Gayle Nienhueser

I0185

From: Ruth Wood [REDACTED]
Sent: Monday, July 09, 2012 6:31 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

To:

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

IBER, AK 99506

Phone: 907-552-2341

Email: alcom.j08@elmendorf.af.mil

I am writing to comment on the P-JARC EIS. I support the No Action Alternative. I am very concerned that the plan vastly increases the area of training operations and that the plan will allow training as low as 500 ft. The expanded training area would greatly impact both the Lake Louise area and the Talkeetna area. Residents, businesses, and property owners in Lake Louise and in Talkeetna oppose the expansion. The increased noise, the increased impact on wildlife, and the increased danger to civilian flyers are significant factors that have not been adequately addressed.

I don't think the Military has done sufficient study and research to determine how to mitigate the impacts to wildlife, or, indeed, whether the impacts can be mitigated. Wildlife is important to residents who depend on caribou and moose for subsistence. Wildlife is important to tourism businesses and hunting guide businesses. Wildlife is important for maintaining ecosystems. Wildlife from large mammals to migratory birds would be impacted. What will be the impacts to wildlife from increased noise and how does the military plan to mitigate for them?

The 500 foot flying limit for F-22s and other military jet flights is unacceptable primarily for safety reasons and secondarily for increased noise. There are a lot of private pilots, flight-service companies, recreational users that access the area. Small planes fly at low altitudes and low speeds. Military jets fly at high speeds and belong at high altitudes. If military pilots need to train to fly jets at high speeds at low altitudes it needs to be done in places where there are no civilian planes in the air and no wildlife on the ground. Low altitude training in the proposed area is an accident waiting to happen, and the civilian public should not be put in such jeopardy.

The Mat-Su Borough is the fastest growing area of the state in terms of population increase. I am concerned that the Military is considering increases in restricted airspace without consideration of conflicts that might arise if the projected increases in population occur.

Thank you for this opportunity to comment.

Sincerely,

Ruth D. Wood
[REDACTED]

I0186

From: Pete Stokes [REDACTED]
Sent: Monday, July 09, 2012 6:38 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

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

Dear Sir or Madame,

I am a private pilot flying out of Lake Hood Strip in Alaska. Below are my comments regarding the Joint Pacific Alaska Range Complex EIS and how they will affect my flying and other GA pilots.

The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities.

The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.

Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.

The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex.

Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.

Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.

The recently proposed relocation of the F-16's from Eielson AFB to JBER appears to have a direct impact on the airspace and airports in Anchorage and the Mat Su Valley. This needs to be quantified and addressed as part of the cumulative impact of the Draft EIS.

Existing MOAs including Susitna, Stony, Naknek and Galena, are not addressed. They should be studied to see if they fit the purpose and need of the JPARC mission.

Please address the above concerns to ensure that general aviation safety is not compromised.

I0186

Very Truly Yours,

Peter Stokes, Private Pilot [REDACTED]
[REDACTED]
[REDACTED]

I0187

[REDACTED]

From: John Murry [REDACTED]
Sent: Tuesday, June 26, 2012 11:39 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

Dear Sir,

I am opposed to the addition of the Fox 3 MOA in South Central Alaska. I have flown in Alaska for thirty years as a recreational pilot. The proposed addition affects areas that I have used for recreation for my thirty years of flying. The proposal is unreasonable and burdensome to the general aviation users.

Please consider my comments,

John Murry
[REDACTED]

I0188

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0188	Eli Cook			General (to the EIS)	page 10-1 line 31... change Cooper to Copper. It's the Copper Valley.

I0189

**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): Carolyn (Cari) Sayre Date: 7/8/12
Title: _____

Organization: _____

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

Comment submitted on behalf of (choose one):

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

Email: _____

Phone: _____

Mailing Address: _____

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

Comment Topic(s):

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

Resource Areas:

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

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 July 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;

Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0189

Comment(s):

I attended both the Scoping meeting and the Public Hearing for this JPARC-EIS. Both times I felt uneasy and even intimidated by the sheer number of uniformed individuals in the very small Swiss Alaska Inn in Talkeetna. The space was congested, even over-crowded, and I know of several people who did not attend because of the chosen venue. If the purpose is truly to HEAR from the public, the hearing should take place in a Public Space — a school, for instance. Even then, is it really necessary to bring so many military personnel?

I urge you to make No Changes to FOX 3. The only alternatives left in the draft EIS both allow overflights as low as 500 feet AGL. This is simply unacceptable. The minimum level for overflights should remain at 5000' AGL. Low-flying aircraft are much louder, and at the speed they're flying, can come over a ridge and be upon hikers/fishermen/wildlife very suddenly with their ear-splitting noise. This is not anyone's idea of a pleasant wilderness experience.

Natural (i.e. QUIET) soundscapes are increasingly rare, even in Alaska. There is an innate value to quietude, and we cannot, as a species, afford to lose it.

In Appendix K, Table K-1, Existing Mitigations, Ref ID 438, it states, "Raise the minimum altitude to 5000 feet AGL for FOX 1 & 2." This is to mitigate biological, recreation, land use & subsistence issues. It should be the same for FOX 3 — apply this same mitigation to FOX 3.

I understand that the No Action Alternative would require more distant travel for JBER trainees. But what about all the people from Anchorage & the Valley who are looking for "accessible wilderness" and who, if changed, were made to lower flights to 500' AGL, would have to drive much farther to arrive at suitable quiet destinations?

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by ^{July 9} 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.

see P. 2

I0189

P.2 Carolyn Sayre JPARC-EIS
Comments

In the big picture, the military may save some money, but the fuel would be spent – perhaps even more than was saved – by the public.

The Talkeetna Mountains are a gem of accessible wilderness. People love to recreate there.

Businesses in Talkeetna guide trips there; air services drop off/pick up clients.

The dangers imposed by military over-flights down to 500' are too great.

Last but not least, think of the impacts on wildlife. No adequate study has been done on noise impacts to the health & well-being of wildlife in Fox 3. Please do not make any changes until studies have been done. Humans can label, make sense of, or rationalize the noise that bothers them. Not so for birds, animals, even fish. They will be impacted. If noise is a known stressor for humans, it follows that the same noise level will create stress for wildlife.

Thank you for your time. CS

N.3 GOVERNMENT RESPONSES TO COMMENTS

Table N-5. Government Responses to Comments

Submittal ID	Comments	Responses
G0001-1	I have begun review of the draft EIS for the JPARC Modernization and Enhancement. The comment and request for clarification was determined to require a response, ideally, before the borough proceeds with comments on the effects of the proposed alternatives. Many of the tables in Chapter 3 that include various information on the extent and effects of the Alternatives appear to fail to list the extent and effects of the Alternative E Fox 3 MOA as a standalone alternative. Many Chapter 3 tables list three Fox 3 proposal areas: 1 = Existing Fox 3 MOA 2 = Fox 3 MOA Alternative A and E 3= Fox 3 MOA Alternative A Review of Figure 2-1 and Figure 2-2 suggests that Fox 3 MOA Alternative A completely encompasses Fox 3 MOA Alternative E. These two figures lead one to believe that proposal area 2 is the same as proposal area 3. Please clarify how the reader can discern the extent and effects of Alternative E in Chapter 3. A reader could assume a typo in the footnotes and that the third proposal area is Alternative E. However, there are several tables that show the third proposal area to include items not included in proposal area 2. Therefore, it does not appear to be a simple typographic error. Respectfully, Emerson Krueger Planner CF: Warren Keogh, District 1 Assembly Member John Moosey, Manager Eileen Probasco, Acting Director, Planning and Land Use	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Final EIS will be revised to remove the potential for misunderstanding or confusion discussed in the comment, regarding the Fox 3/Paxon MOA Addition proposal in Chapter 3, Affected Environment and Environmental Consequences.
G0002-1	Lt. Gen Hoog, Please find attached the request to extend by 60 days the public comment period on the JARC draft EIS. The four mayors have strong concerns that the F-16 move has not been included in this document. Therefore our request is made to extend this comment period.	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p> <p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
G0002-2	The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012. The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.	See Response G0002-1.
G0003-1	1. Caribou herd & other wildlife - impacts?	The effects of the proposed action on caribou herds and other wildlife are addressed and mitigations identified as applicable throughout the document for both definitive and programmatic actions. Sections 3.1.8.3 and 3.1.8.4 provide impact analysis and mitigations with regard to aircraft overflight and noise (Fox/Paxon MOAs). Sections 3.2.8.3 and 3.2.8.4 provide impact analysis and mitigation with respect to aircraft overflight of existing training areas and live ordnance delivery (RLOD). Sections 3.3.8.3 and 3.3.8.4 provide impact analysis and mitigation with respect to ground training activities (BAX and CACTF). Sections 3.4.8.3 and 3.4.8.4 provide impact analysis and mitigation with respect to combined air and ground training activities (DMTR). Sections 3.5.8.3 and 3.5.8.4 provide impact analysis and

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>mitigation with respect to night joint training. Impact analyses and conceptual mitigation are provided at a more general level in the equivalent sections for the programmatic alternatives. Additionally, Appendix E provides for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.</p>
G0003-2	2. Troop movement throughout area in future - will it happen & then what restrictions are in place?	Units will continue to transition through the Wasilla/Matanuska Valley en route to the Donnelly and Fort Wainwright Training Areas. All unit movements will comply with directives of the Alaska Department of Transportation and all Army regulations concerning unit movements along public transportation routes. The number of unit movements may increase as the training OPTEMPO adjusts from a war footing to an Army preparing to respond to National Command Authority directives. From time to time, the Army may utilize those areas for which it has agreements with the State to use lands currently withdrawn from public use. The Army will remain compliant with the Sykes Act to allow recreation on lands not being actively used to support military training events.
G0003-3	3. What changes to the current plan are expected within the next 30 years? If you don't have a plan for the future - in light of the ever changing training needs & equipment - and potential OPFOR, why not? And supposing you do - then disclose the possible scenarios -	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force have prepared plans for future training needs and facilities. Advance planning for the JPARC proposals currently in the JPARC EIS have been under way for a number of years. A master planning and requirements development process formally began in 2009, was completed with the preparation of the JPARC Master Plan in July 2011, and was approved by the Joint Range Strategic Working Group (JRSWG). The JRSWG manages and oversees range and airspace within the military commands in Alaska. The plan's purpose is to guide the development of JPARC for the next 30 years by coordinating the efforts of the Army and Air Force and championing joint training (including the Navy and other service components). The Master Plan was a precursor to the JPARC EIS and is a living document that will evolve with military requirements, changes in the baseline, and input from all stakeholders throughout the EIS process. Neither the Master Plan nor the EIS is structured to assess possible training or exercise scenarios.
G0004-1	So I will be submitting written comments that would be much more	Thank you for your comment on the JPARC Draft EIS. This comment is

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	extensive. I don't have those formulated at this time. I do want to state though that I am disappointed that this public hearing is on a Saturday, has been scheduled here in Fairbanks, one of the major -- the second largest community in Alaska, that it was scheduled for Saturday. There are two sessions, I understand that, but Saturday night is not a good time to have a public hearing. So I'm hoping that if there are further public hearings held in this overall process that they are scheduled in Fairbanks. We have the best turnout and information dissemination on weekdays and I would ask that that please be put into any further scheduling. I don't think it's appropriate to have a -- as I said, a public hearing on this issue on Saturday noon, especially in the summer.	duly noted. The Army and Air Force did everything feasible to try and schedule the public hearings in a timely and equitable manner to meet the needs of the public. Please understand that public hearings had to be scheduled in 10 locations. To stay on schedule, public hearing venues had to be selected during the beginning of the tourist season and a number of venues in Fairbanks were unavailable during the week.
G0005-1	<p>As Governor of the State of Alaska, I fully support the modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC). As the largest military training range in the United States, JPARC is critical to securing and defending our nation. In this heightened threat environment, it is vital that we make every effort to maximize the training opportunities for the brave men and women who serve in our Armed Forces.</p> <p>I take seriously my constitutional duty as Governor to ensure the safety and security of Alaska's citizens and communities. Our Administration will continue to support the military industrial complex in Alaska while doing everything in our power to protect Alaska's pristine environment. For this reason, I believe the JPARC Environmental Impact Statement is an important and welcomed process.</p> <p>I am confident that the State of Alaska and the United States Armed Forces will partner together in identifying a course of action that will allow for the expansion of military training capabilities, as well as the continued protection of our beautiful, natural environment.</p>	Thank you for your comment on the JPARC Draft EIS. Your comment has been duly noted. The Army and Air Force units based within the state of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force must continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final Environmental Impact Statement, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid user conflicts or mitigate conflicts to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. The modernization and enhancement of JPARC provides the Army and Air Force a unique opportunity to conduct state-of-the-art training in diverse terrain and large airspace areas to meet the national security requirements of the United States in the twenty-first century.
G0006-1	<p>One of the things I'd like the folks to address is the issue of the proposed floor for the Fox 3 MOA. Currently it's proposed to go to 500 feet AGL and in talking to a number of the air taxi operators, the pilots, for the record I am a commercial pilot with 17 years of bush flying experience here in Alaska. I'm very familiar with the Talkeetna mountains and essentially the rest of the Fox 3 MOA and do fly through it on a regular basis just in doing this job.</p> <p>The area that really gets the most general aviation traffic is the area sort of --</p>	Thank you for your suggestions. A good portion of Alphabet Hills and those areas south noted in the comment are located within the proposed Paxon MOA airspace where flight activities below 14,000 feet MSL would only occur during major flying exercises (MFEs). The six annual MFEs are only permitted during specified months of the year, which does not include the September hunting season. The proposed Alternative E configuration, more limited use of the Paxon MOA lower altitudes, and those existing and proposed safety measures discussed in the FEIS Airspace Management and

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>if you draw a line from about the Susitna River across to the Alphabet Hills and south that area seems to have the most -- the densest amount of general aviation traffic, you know, mostly Supercubs and Cessnas and whatnot, small float planes getting in and out of hunting cabins. It's primarily during the non-winter months where you see a lot of that traffic. It's during the, you know, primarily May to October with a lot more activity occurring in the late August through mid-October timeframe. It's kind of the highlight of hunting season.</p> <p>If that floor were to be raised to say 1,500 feet AGL or at least a -- perhaps a new sector created within the MOA that can be left off most of the time but only turned on when absolutely necessary I think that would go a long way to reducing some of the general aviation pilots' concerns about basically getting run over by an F-16 or something larger. So I'd ask that the folks putting this proposal together go ahead and take a good long look at that.</p> <p>I think alternative E where the southern boundary of the Fox 3 MOA was -- instead of being south of Lake Louise it was moved a little bit to the north so it only covered Tyone or Lake Tyone or Lake Susitna I believe. Even if you move that southern boundary in that sector to the outlet of Lake Susitna at the very mouth of Tyone Creek that would be another good point to put in there that would, again, relieve some of the concerns that folks in the Lake Louise area have.</p>	Flight Safety sections should help alleviate some of the concerns pilots have expressed over the airspace proposals.
G0006-2	<p>One of the things I'd like the folks to address is the issue of the proposed floor for the Fox 3 MOA. Currently it's proposed to go to 500 feet AGL and in talking to a number of the air taxi operators, the pilots, for the record I am a commercial pilot with 17 years of bush flying experience here in Alaska. I'm very familiar with the Talkeetna mountains and essentially the rest of the Fox 3 MOA and do fly through it on a regular basis just in doing this job.</p> <p>The area that really gets the most general aviation traffic is the area sort of -- if you draw a line from about the Susitna River across to the Alphabet Hills and south that area seems to have the most -- the densest amount of general aviation traffic, you know, mostly Supercubs and Cessnas and whatnot, small float planes getting in and out of hunting cabins. It's primarily during the non-winter months where you see a lot of that traffic. It's during the, you know, primarily May to October with a lot more activity occurring in the late August through mid-October timeframe. It's kind of the highlight of hunting</p>	See comment response G0006-1.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>season.</p> <p>If that floor were to be raised to say 1,500 feet AGL or at least a -- perhaps a new sector created within the MOA that can be left off most of the time but only turned on when absolutely necessary I think that would go a long way to reducing some of the general aviation pilots' concerns about basically getting run over by an F-16 or something larger. So I'd ask that the folks putting this proposal together go ahead and take a good long look at that.</p> <p>I think alternative E where the southern boundary of the Fox 3 MOA was -- instead of being south of Lake Louise it was moved a little bit to the north so it only covered Tyone or Lake Tyone or Lake Susitna I believe. Even if you move that southern boundary in that sector to the outlet of Lake Susitna at the very mouth of Tyone Creek that would be another good point to put in there that would, again, relieve some of the concerns that folks in the Lake Louise area have.</p>	
G0007-1	<p>And the city of Delta Junction wants to state that we made a memorandum of agreement with the Army in '06 and upon investigation it was essentially omitted from the full JPARC Draft EIS and as a result we feel the EIS is -- the Draft EIS is defective. There -- will there be an amended version of this before a final version -- of the EIS before a final version comes out is something that we're concerned about. Because we think, again, it should be available for public comments after we see -- after you've heard what people are concerned with. We will object JPARC -- to JPARC moving the Final EIS without this opportunity for review and comment. We note that JPARC was provided with a copy of the '06 MOA by -- at the scoping meetings and still failed to address it in the Draft EIS. Numerous commitments contained in the '06 MOA are violated by the proposed changes in the Donnelly training area and other portions of training ranges near Delta and Gulkana. A partial listing of the violations will be included in our written comments which will be coming. The failure to discuss these violations and the necessity for them makes the EIS incomplete and inaccurate. The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are not addressed or</p>	<p>Thank you for your comments on the JPARC Draft EIS. Your comments are duly noted.</p> <p>The proponent consulted with Delta Junction as a local government, specifically the Mayor of Delta Junction, Mary Leith-Dowling. Also, Air Force and Army leadership met with Delta Junction community leaders during both public scoping meetings (see Appendix A, Table A-2 in Volume 2 of the Draft EIS) and public hearing meetings. During scoping, the following attendees joined Air Force and Army leadership at the Delta Junction City Hall: Delta Junction Mayor Mary Leith-Dowling, Delta Junction City Administrator Mike Tvenge, and Delta Junction Mayor Pro Tem Pete Hallgren. During public hearings, Air Force and Army leadership met with Delta Junction City Administrator Mike Tvenge.</p> <p>The Draft EIS mentions the Memorandum of Agreement between USARAK and the city of Delta Junction on Page 3-206. However, additional language will be added to the Final EIS. The paragraph will be changed to read:</p> <p>"Delta Junction, directly north of Fort Greely at the junction of the Richardson and Alaska Highways, does not have a comprehensive plan for land use but has established municipal ordinances governing land use and subdivision layout and approvals. The City Planning Commission serves as both an advisory body (prepares plans) and enforcing body of city</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>inadequately addressed in the Draft EIS. When the city acquiesced to the inadequate use or ac -- Donnelly range expansion EIS in '06 it did so with the commitment by USARAK that training at the Caktif (ph) and Backs (ph) would be limited to those described in the supplemental EIS prepared by USARAK. The city pressed for those facilities to be located at the south end of the Donnelly training area. USARAK pressed for a location at the north end of the Donnelly training area immediately joining city limits. We did much of this based upon our own experience with fire only a little bit prior to that. The compromise described in the 2006 MOA is that the city would acquiesce to the closer, more dangerous location, but only with safeguards and with the Army's assurance that the training activities would be limited to those described in the supplemental Draft EIS. The JPARC Draft EIS fails to address that bargain or JPARC's reasons for violating the bargain. Which we searched it, there -- it was never mentioned once. These comments to the public hearing are not a complete list of our concerns. Complete written comments will be submitted to you by June 7th, 2012, but unless these issues are fully addressed in a supplemental Draft EIS it's more likely than not that the city will challenge the adequacy of the JPARC Draft EIS leaving aside any claim by the city for breach of the '06 MOA. And if we have any -- like I say, we really do expect to see again the Draft EIS so that -- you know, amended one so that we can indeed see if that is finally remembered that we did have a mem -- an MOA with everybody.</p>	<p>ordinances. The Commission approves all plat plans, variances, and conditional use requests. The "keyhole" area is essentially undeveloped and wooded, with one or two existing residences. There is an existing Memorandum of Agreement (USARAK-MOA-029), signed 16 May 2006, between USARAK and the City of Delta Junction. The agreement lays out specific operational actions and restrictions that apply to the use and management of the existing BAX and CACTF in DTA-East (USARAK 2006-3). Mitigations as outlined in the BAX and CACTF Final EIS (dated June 2006) and ROD (signed 19 July 2006) remain in effect and will not be superseded unless a better practice, enhanced, stringent mitigation is implemented as part of this EIS."</p> <p>Page 3-191 of the Draft EIS referenced Section 3.2.3.1, which discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should construction be needed in the future, the Army will conduct necessary environmental analyses. The BAX proposal does not have a hydrologic impact, since this action affects only airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC DA PAM 350-38). These are based on estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern during development of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p> <p>USARAK Regulation 95-1 and Army SOPs stipulate those safety practices that aircrews must follow when planning and conducting flight missions,</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>including altitude restrictions for avoiding noise-sensitive areas, populated areas, livestock, dwellings, and other sensitive areas.</p> <p>Time-averaged and peak noise levels reflecting baseline munitions training do not exceed 62 dB CDNL and 115 dB PK 15(met), respectively, in areas outside of range boundaries. Flying operations are not conducted at a frequency sufficient to result in time-averaged noise levels exceeding 65 dB DNL.</p>
G0007-2	The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are not addressed or inadequately addressed in the Draft EIS.	<p>Page 3-191 of Draft EIS references Section 3.2.3.1 (Page 3-117 – Page 3-119), which discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should future construction be needed, the Army will conduct necessary environmental analyses. The BAX proposal does not have a hydrologic impact since this action affects only the airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC DA PAM 350-38). These are based upon estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern during development of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p>
G0007-3	The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are	<p>Page 3-191 Draft EIS references Section 3.2.3.1 (Page 3-117 – Page 3-119), which discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should there be future requirements for construction, the Army will conduct necessary</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	not addressed or inadequately addressed in the Draft EIS.	<p>environmental analyses. The BAX proposal does not have a hydrologic impact since this action affects only the airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC DA PAM 350-38). These are based on estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern as a function of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p> <p>USARAK Regulation 95-1 and Army SOPs stipulate those safety practices aircrews must follow when planning and conducting flight missions. They include altitude restrictions for avoiding noise-sensitive areas, populated areas, livestock, dwellings, and other sensitive areas.</p> <p>Time-averaged and peak noise levels reflecting baseline munitions training do not exceed 62 dB CDNL and 115 dB PK 15(met), respectively, in areas outside of range boundaries. Flying operations are not conducted at a frequency sufficient to result in time-averaged noise levels exceeding 65 dB DNL.</p>
G0007-4	The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are not addressed or inadequately addressed in the Draft EIS.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>impacts and locations of the proposals in this EIS.</p> <p>Prior to implementing any of the programmatic proposals considered in this EIS that could expand training (e.g., higher intensity levels of training, or broader types of training and expanded use of the training areas), proponents would undertake further evaluation and an appropriate level of NEPA analysis, permitting, and agency coordination.</p> <p>At a minimum, this proposal incorporates all of the provisions from the 2006 MOA.</p>
G0008-1	<p>The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012.</p> <p>The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p> <p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.
G0009-1	The TLO's scoping comments dated January 28, 2011, appear to have had no influence on development of the draft EIS. Because of this I am incorporating the TLO's previous objections by reference in this review to the draft EIS. Our earlier objection to remotely piloted aircraft (RPA)/unmanned aerial vehicle (UAV) corridors identified over Trust land needs to be corrected and expanded. The lack of spatial references in the scoping documents resulted in an underestimation of the amount of Trust land that will be impacted by unmanned aerial vehicle overflights. The following table shows specifically the number of Trust parcels involved and the total acreage for each of the proposed corridors. Area Parcels Acres Eielson R-2205 12 1,034 Eielson R-2211 31 1,898 Ft. Wainwright R-2205 20 3,363 Ft. Wainwright R-2211 87 3,532 Total Acres 9,827 Establishment of these corridors with RPA/UAV overflights can be expected to diminish value of these Trust lands for residential and/or recreational development; although difficult to quantify, any reduction in land value from these plans is unacceptable.	The noise levels generated by UAVs at altitudes greater than the "floor" altitude of 1,200 feet above ground level would be similar to or less than that generated by common civilian aircraft that fly in the same areas, and noise impacts would be expected to be minimal. UAV corridors would be used for transit (i.e., not loitering) less than four times per day, two days per week. Although individual overflights might be noticed, overall time-averaged aircraft noise levels beneath the transit corridors would remain well below generally recognized thresholds for significant impacts, and no reduction in land value would be expected to result from the proposed overflight noise. The notes for Table 3-64 are revised in the Final EIS to clarify that State lands include TLO land.
G0009-2	Establishment of these corridors with RPA/UAV overflights can be expected to diminish value of these Trust lands for residential and/or recreational development; although difficult to quantify, any reduction in land value from these plans is unacceptable.	Potential impacts to property values due to noise concerns associated with Unmanned Aerial Vehicles is addressed in Section 3.6.12.1. As stated in Section 3.6.12.3.1, "The noise levels generated under the proposed action are comparable to the noise levels generated by common civilian aircraft and are below the threshold in which adverse noise effects to human populations are expected. Thus, minimal impacts to the population from noise are anticipated under the proposed action. In addition, the complex nature of property valuation factors makes any estimation of the potential effects of noise on land values highly speculative. Other socioeconomic factors, such as business activity, employment, interest rates, land scarcity (or availability), and the nature of the local housing market are much more likely to affect property values than noise levels generated by UAV operations."
G0009-3	The TLO continues to object to inclusion of live fire on the west and northwest boundaries of the Yukon Training Area.	Training and live fire exercises will not change greatly from what has been experienced in the past. The expansion of special use airspace does not currently include additional range construction projects. It does allow the military to expand training, safely, during limited visibility and ceiling conditions. It further allows the Army to incorporate all its assets in a training environment as it must once deployed into an active operational area.
G0009-4	The TLO continues to object to inclusion of live fire on the west and northwest boundaries of the Yukon Training Area.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (*continued*)

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G0009-5	The TLO continues to object to expansion of any use of the Yukon 1 MOA that could interfere with mineral development of the Trust Salcha Block of land.	Your objection is noted. The only proposal that overlaps with the Salcha Block lands under the Yukon 1 MOA is the Night Joint Training proposal. None of the proposed actions will affect surface or air access to mineral resources in the Salcha Block of land.
G0010-1	As stated in the previous comment period the airspace starting at 500 AGL throughout the MOA along with no restrictions on the scheduling of active use is unacceptable. This type of unrestricted activity is a serious hazard to wildland fire fighting and fire detection is flown in this area throughout the summer months. Simply raising the ceiling would create a safety buffer for all civilian aircraft and would allow Part 135 aircraft to operate legally within the airspace.	The Final EIS will be modified to state that coordination will occur between Air Force personnel and wildland fire fighting personnel regarding fire detection and response.
G0010-2	As stated in the previous comment period the airspace starting at 500 AGL throughout the MOA along with no restrictions on the scheduling of active use is unacceptable. This type of unrestricted activity is a serious hazard to wildland fire fighting and fire detection is flown in this area throughout the summer months. Simply raising the ceiling would create a safety buffer for all civilian aircraft and would allow Part 135 aircraft to operate legally within the airspace.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0011-1	On behalf of the Copper Basin Fish And Game Advisory Committee I am formally opposing the expansion of the Fox 3 MOA and more specifically the lowering of the floor of these areas from 5,000 feet to 500 feet for military operations with high speed aircraft. There are many reasons but the main reason we oppose this is for safety purposes for the countless flights that are flown for game counts, surveys, predator control, radio collar tracking of game, and for the thousands of hours of recreational flights for hunting, fishing and other outdoor activities. By mixing high speed jets with slow and hard to see private aircraft in the same airspace, we feel safety would be severely compromised and it would be unacceptable. There are thousands of hours flown each year by hundreds of folks in these areas, and a mid-air collision would be inevitable at some point in time if these changes are made.	The flight safety concerns the Committee and other aviation interests have expressed over the airspace proposals were of utmost importance throughout the planning processes and are addressed in the associated FEIS resource area discussions. While existing advisory services and initiatives have been successful in maintaining a safe flying environment for all civil and military airspace uses, the FEIS notes how these may be expanded with additional mitigation measures considered, as necessary, to further ensure the safe and compatible use of this airspace. As a key stakeholder, the Committee is strongly encouraged to participate in the Alaska Civil-Military Aviation Council meetings and communicate with the 11th Air Force Airspace Management Office to discuss any concerns you may have now or in the future regarding military flight activities in the State of Alaska.
G0012-1	A RESOLUTION BY THE DENALI BOROUGH ASSEMBLY SUPPORTING THE NO ACTION ALTERNATIVE CONCERNING THE	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Denali

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>JOINT PACIFIC ALASKA RANGE COMPLEX (JPARC)</p> <p>WHEREAS, the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement proposes extending training, including live ordnance delivery, within the confines of the Denali Borough; and</p> <p>WHEREAS, the Denali Borough Assembly is the governing body of the Denali Borough; and</p> <p>WHEREAS, the areas in question are important to Denali Borough residents for a variety of uses including hunting, recreation, and access to private property; and</p> <p>WHEREAS restrictive and constraining uses of Denali Borough lands have been identified by the extension of the in-place bombing and military lands identified in the JPARC Environmental Impact Study.</p> <p>NOW THEREFORE BE IT RESOLVED: that the Denali Borough Assembly supports the “No Action” alternative concerning proposed realistic live ordnance delivery.</p>	<p>Borough and Alaskan resources. As explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.</p>
G0013-1	<p>VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW National Park Service Alaska Regional Office 240 W. 5th Avenue Anchorage, AK 99501 ALCOM Public Affairs 9480 Pease Avenue, Suite 120 JBER, AK 99506 The following comments are provided for the draft environmental impact statement (DEIS) for proposed U.S. Department of Defense military training for the Joint Pacific Alaska Range Complex (JPARC) in Alaska:</p> <p>While the JPARC does not include park areas directly, it is near the Wrangell-St. Elias National Park and Preserve (WRST). Impacts on subsistence in one area necessarily influence subsistence in nearby areas. For this reason, there is concern regarding the effects of training operations on subsistence users within Alaska Game Management Unit 13, especially along the Denali and Richardson Highways. The subsistence analysis for the expanded Fox 3 and new Paxon MOAs is incomplete in terms of the communities analyzed, the data upon which the analysis is based, and how the communities are classified with regard to their dependence on subsistence. Limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns</p>	<p>The Air Force recognizes that there are many individuals and communities who rely on the subsistence resources under the proposed Fox 3 and Paxon MOAs. The Region of Influence for this proposed action focused on those communities directly beneath or within 20 nautical miles of the proposed airspace in order to provide the characteristics of those communities who depend on the affected subsistence resources and may have fewer opportunities to find alternative subsistence resources. The 20 nautical miles was used as a best estimate of a maximum distance traveled without the use of aircraft. Text in the EIS has been revised to clarify the purpose and origin of the Region of Influence. Text has also been added to note that while the communities listed in Table 3-24 depend on the affected subsistence resources, there are individuals from other communities who also harvest subsistence resources in the area who could be also be adversely affected by potential impacts.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances. Instead of the handful of communities included in the draft EIS, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) under the Federal Subsistence Program for moose, caribou or both on lands within the Fox and Paxon MOAs. Customary and traditional use determinations are based on an analysis of all available data regarding patterns of resource use and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule.	
G0013-2	<p>. . . In what follows, the phrase “potentially affected rural communities” refers to the communities that have C&T for moose or caribou in the MOAs.</p> <p>Also, community harvest data that is over twenty years old is not adequate to evaluate impacts to contemporary subsistence livelihoods (To those familiar with this data, the “most representative year” referred to in the analysis is identifiable as the most recent year for which comprehensive subsistence survey data are available.). JPARC could follow the lead of the Alaska Gas Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support updated surveys where needed. The Susitna-Watana Hydroelectric Project is similarly considering the need to conduct updated comprehensive subsistence surveys as part of its planning process. As a first step, the list of potentially affected rural communities (as discussed above) could be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding could be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information for the potentially affected rural communities can be incorporated into the subsistence impact analysis.</p>	<p>Section 3.1.13.1 of the Draft EIS acknowledges the community harvest data by the Alaska Department of Fish and Game (ADFG) is dated; however, it is the best data available per Council of Environmental Quality (CEQ) Section 1502.22 at the time the EIS was being developed. Text has been added to the Final EIS to clarify the reason for the dated information but no updated data is available to incorporate into the Final EIS.</p> <p>The Air Force evaluated the Alaska Stand Alone Pipeline EIS for updated data as suggested in the comment. The Draft Pipeline EIS was released for review in January 2012 and the subsistence analysis also uses dated information for community harvests (see http://www.asapeis.com/joomla/index.php/draft-eis). The Air Force also reviewed information on the Susitna-Watana Hydroelectric Project for subsistence information. The Federal Energy Regulatory Commission is in the early stages of the environmental impact analysis process. Scoping was completed earlier this year and data collection, including possible updates to subsistence data, is underway. However, it is not anticipated that this data would be available for use by the Air Force in the Final EIS.</p>
G0013-3	Finally, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations fails to recognize the	An emphasis on Alaska Native culture was made in the impact analysis methodology because of the central role subsistence plays in that culture.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities in which 80 percent or more of the households report using subsistence resources should be classified as high dependence regardless of the community’s composition.</p> <p>Thank you for the opportunity to comment, and for extending the comment period.</p> <p>If you have questions, you may contact Barbara A. Cellarius, Ph.D., Cultural Anthropologist/Subsistence Specialist, Wrangell-St. Elias National Park and Preserve, [deleted for privacy].</p>	<p>Alaska Native communities are likely to have higher sensitivity to any impact due to reduced employment opportunities and increased economic importance of harvest, and considerations of the social/cultural effects due to potential disruption in subsistence. It is not meant to downplay the importance of subsistence to rural non-Native residents. Community ranking is used to determine the significance of any potential impacts. The subsistence analysis in the Final EIS has been updated to note that communities with more than 80 percent of the population participating in subsistence activities are ranked as having a high dependence on subsistence resources as suggested in the comment.</p> <p>See also response to comment G0013-2.</p>
G0014-1	<p>The following are the Alaska Department of Natural Resources’ (DNR) comments and recommendations on the Definitive Action described in the EIS related to the Realistic Live Ordinance Delivery proposal. The first part of this response identifies issues related to clarity of the proposal and provides additional background information pertinent to the closure of state land. The second identifies proposed changes to the Realistic Live Ordinance Delivery option, and a final section focuses on those actions that may be required by the state to ensure public safety when live fire exercises are underway. These comments assume that either the Donnelly Training Area or the Blair Lakes Training Area are available and that the actual delivery of ordinance occurs within a limited area within each of these training areas. (1) It is also assumed that the military can or should be able to identify specific portions of the overall target area that may be affected at specific periods of the year.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0014-2	<p>Clarity of Proposal. Table 2-5 identifies Airspace Designation and the annual days of use. In the case of R-2202A, B, C and D the number of days of use is approximately 250. In the case of R-2211 it is 170. However, on page 2-12, line 27, use days are identified as 150 annually. The text needs to be clarified to explain why R-2211 cannot be used more frequently, and there needs to be discussion, if Alternative B is selected, on the distribution of use days between the two Training Areas. It would seem that a more even distribution would result if alternative training sites were available.</p>	<p>The text will be clarified in the Final EIS to state the annual number of days for use in R-2211 is 170 days vice 150, as stated in Table 2-5. The days of use for R-2211 are correct as stated. As stated in DEIS Section 2.1.2.1.2, Alternative B, Lines 22-24, "The Blair Lakes Impact Area would provide for the use of inert ordnance only, given its current use by the Air Force, as well as its current configuration and hazard zone safety requirements." The Oklahoma Impact Area and the proposed inert targets (see Figure 2-4) in R-2202, on the other hand, will be used to a greater degree with the use of both</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		live and inert ordnance.
G0014-3	There also needs to be some discussion as to whether there is the ability by the military to shift the sortie approach from one attack angle/area to another in order to avoid the public recreation and hunting. This is important since the public uses particular areas at specific times of the year, and the avoidance of these areas through the selection or specific attack vectors would mitigate impacts.	The approach and release point for RLOD is only possible from the area between R2202 and R2211 due to the type of airspace required (restricted area). Due to land ownership near the other boundaries of the existing restricted areas, as well as existing routes for non-military aircraft, the expansion of R2202 is limited to the west side for the purpose of this proposal. Any further divisions to the proposed expansion areas (for individual activation) would result in airspaces too small to accomplish the task.
G0014-4	Based on discussions with JPARC personnel, the delivery of ordinance occupies a specific horizontal and vertical portion of the Drop Areas. For example, a delivery could use the area of R-2202A, as depicted in Figure 2-4. It would seem, then, that this horizontal and vertical airspace could be managed in such a way that during periods of the year when a sensitive public activity occurred near the impact zone, that the vector furthest away from this site could be selected for use at that time.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The management of the airspace as discussed in the comment will be further analyzed and a determination made in the Final EIS.
G0014-5	In general, then, the principal use of the ground evacuation area is related to moose hunting, but this hunting occurs during two periods, as noted above. The EIS identifies only the September period for moose hunting and it uses different dates than those actually associated with this hunting activity. Mitigation measures should therefore focus on this period of time. Moreover, this pattern is also likely to continue in the future; there are no additional state land disposals that are planned and the area lacks access and economically usable resources.	Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-6	Changes to Mitigation Measures. While the state is very much interested in providing a training area for the military that permits the continuation of the current forces in the Fairbanks area, this must be weighted against the impact of the Realistic Live Ordinance Delivery option upon the public and, specifically, their use of state land. Our interest is in minimizing that impact. We also believe that the use of both the Blair Lake and Donnelly impact areas is appropriate since this alternative (B) minimizes adverse effects to public activity on state land during high use periods, which tend to	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	occur during the fall hunting season.	prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-7	The number of actual days that the ground evacuation area is closed under the Definitive Actions needs to be clarified. The text on pg 2-12 line 27 states activities would be conducted 150 days annually, while the table 2-5 presented just prior indicates 250 days of annual use.	Please see response to comment G0014-2.
G0014-8	Information provided by ALCOM planners indicates that no training activities will occur during Saturday and Sunday throughout the year. Additionally, pg 6 line 29 indicates that no training activities will occur after 7:00 pm on Friday including Saturday and Sunday. In recognition of use patterns by hunters, the year round restriction on training activities on weekends should be extended to include Friday afternoon. People using the ground evacuation area often gear up, travel to the area, and start using these areas beginning in the early afternoon on Friday. It is therefore appropriate to accommodate this activity since it is directly related to the weekend use of this area. Openings on Fridays should be restricted to 0700 to 1400 hours.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-9	The period when no training exercises will occur related to moose hunting season should be changed, to reflect the actual current pattern of use. Closure should occur from August 15 to September 15, November 15 to December 15, and January 15 to February 28. These dates may change over time and it is recommended that the military review the closure dates with the ADF&G at the beginning of the year (or another time that may be appropriate for the parties. The closure of the ground evacuation area between June 27 and July 11 is considered appropriate.	Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-10	Include alternatives and/or recommendations for the horizontal/vertical stratification of the attack vectors, to provide for diversity of approach and to minimize impacts on the public.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-11	During the moose hunting periods, sorties should be directed to the Blair Training Area for inert ordinance and to the use of attack vectors that are more distant from Wood River. During the same period inert and live ordinance may use the Donnelly Training Area. Our preference is that the more northerly/easterly attack vectors be used during this period within this area.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-12	At other times of the year, operations are appropriate in either training area, although our preference is to use attack vectors that are to the north and east and that avoid the Wood River and Rex Trail areas in the Blair Lakes Impact Area and to use attack vectors with a similar orientation for the Oklahoma Impact Area, to avoid use areas to the west.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-13	In addition to these measures it is recommended that the military publish, at the beginning of the calendar year, proposed closure areas and the dates associated with this use. This will allow the public to know in advance which areas are to be avoided, especially if it is ultimately determined that both military training areas are to be used and that specific attack vectors are to be used. This information should be displayed on maps that are easy for the public to understand.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0014-14	The military should coordinate with local government and the Alaska Department of Natural Resources on an annual basis, or as needed, to provide information and maps that identify closures and public access restrictions.	The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.
G0014-15	<p>State to Prepare Regulations. As we have indicated in both discussion with military staff and in correspondence, since the military must have control over the surface at the times of ordinance delivery, the state will be obliged to develop a special use designation (SUD) for the impacted areas as well as implementing regulations. Without the use of these methods the federal government will not be able to ensure control over this area and therefore meet federal requirements for the control of surface activities in areas that it does not own.</p> <p>From our perspective, the SUD and its regulations must be developed in such a way that maximum public use of the ground evacuation areas is retained while closing such areas for the minimum period of time necessary to conduct such operations. The SUD will have to identify areas and dates of closure and will have to indicate which activities are affected. (We presume that all public access to and uses within the ground evacuation areas may not be precluded.) To ensure that we meet the test of minimizing impacts to the public, the mitigation measures that are identified above must be given careful consideration and incorporated where feasible. We also recommend Alternative B as described on p. 2-16 as the preferable option. The regulations must reflect the access recommendations contained in the SUD.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force proponent will work closely throughout the SUD process to provide detailed information on locations and durations of closures and a proposed safety and access control plan.</p>
G0014-16	I need to emphasize that DNR has also serious concerns with the proposed Military Operating Area (for aircraft) and specifically with the probable impacts of that proposal on public access, including both land access and aircraft movement. These concerns and the state's response to these issues are to be provided, however, by the Atlanta Department of Transportation and Public Facilities in separate correspondence.	Your concerns are noted. Please refer to responses to Alaska Department of Transportation and Public Facilities comments.
G0014-17	I need to emphasize that DNR has also serious concerns with the proposed Military Operating Area (for aircraft) and specifically with the probable impacts of that proposal on public access, including both land access and aircraft movement. These concerns and the state's response to these issues are to be provided, however, by the Atlanta Department of Transportation and Public Facilities in separate correspondence.	The FEIS Airspace Management and Land Use discussions address those potential impacts relating to air and land access for the MOA and other proposals in Chapter 3 of the Draft EIS; and Appendix K notes those existing and proposed mitigations that would be pursued with government agencies and other stakeholders along with other viable options for minimizing these impacts. The Air Force and the Army proponents for the different proposed actions will meet with affected agencies through the appropriate forums to

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		help find solutions to those issues and concerns that will support both military and agency needs.
G0014-18	Should you wish to discuss this further or require clarification of issues that are identified here, please contact Bruce Phelps, Chief, Resource Assessment and Development Section at 269-8592 or bruce.phelps@alaska.gov.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0015-1	<p>The Department of the Interior has reviewed the March 2012 Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS). The Draft EIS analyzes twelve military training improvement actions proposed on military range lands, maritime training areas, and airspace units of the U.S. Department of Defense (DoD) in Alaska.</p> <p>Our comments and recommendations are made in accordance with the National Environmental Policy Act, Endangered Species Act, Fish and Wildlife Coordination Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Wild and Scenic Rivers Act, and Federal Land Policy and Management Act. Our general comments are below; specific comments are provided in Attachment 1. We believe these comments need to be addressed in the Final EIS.</p>	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0015-2	<p>The short-tailed albatross (<i>Phoebastria albatrus</i>) is listed as endangered under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq; 87 stat 884, as amended). Short-tailed albatross is a pelagic seabird whose range includes the Gulf of Alaska in the Temporary Maritime Activities Area during the months of April through October. In February 2010, the U.S. Navy (Navy) produced a Biological Evaluation (BE) for the Gulf of Alaska Navy Training Activities (referenced in Navy 2011). The BE assessed potential effects of Navy training activities on short-tailed albatross and described effective protective measures for the species. Information on potential effects of the proposed training activities and mitigation measures that will be used to avoid adverse impacts to short-tailed albatross in the Gulf of Alaska need to also be included in the Final EIS.</p> <p>The proposed programmatic action for “Missile Live Fire for AIM-9 and AIM-120” occurs in the summer range of the short-tailed albatross in the Gulf of Alaska. Therefore, the Final EIS needs to state that DoD will initiate consultation with the Fish and Wildlife Service (FWS) for short-tailed albatross, if the “Missile Live Fire for AIM-9 and AIM-120” action is developed into a “Definitive Action.”</p>	<p>As stated in the Impact Section 3.11.8.3, the Navy is already training with these weapons in this area, so the programmatic proposal would represent an increase in operations but not a completely new effect for this area. No new impacts to biological organisms are expected. In-depth discussions on all species effects from military activities in the Gulf of Alaska were provided in the Gulf of Alaska Navy Training Activities Final Environmental Impact Statement/ Overseas Environmental Impact Statement (Navy 2011). If the Missile Live-Fire for AIM-9 and AIM-120 proposal is developed into a ‘Definitive Action,’ Section 3.11.8.3.1 of the DEIS states, “because of the presence of endangered and threatened species in the project area, compliance with ESA Section 7 requirements are necessary including formal or informal consultation with NOAA Fisheries and USFWS.”</p> <p>The recommended text will be added to the FEIS, “DoD will initiate consultation with the Fish and Wildlife Service (FWS) for short-tailed albatross, if the Missile Live-Fire for AIM-9 and AIM-120 action is developed into a ‘Definitive Action.’ Appropriate coordination and consultation will be initiated with the National Marine Fisheries Service (NOAA Fisheries) to meet requirements of the Endangered Species Act and</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Marine Mammals Protection Act as they pertain to listed marine species and marine mammals in the Gulf of Alaska."
G0015-3	<p>Migratory Birds and Bald and Golden Eagles</p> <p>As discussed below, existing data and additional information for eagles need to be presented and analyzed in the Final EIS. For example, the number of bald and golden eagles that inhabit the proposed Fox 3 and Paxson Military Operations Areas (MOAs) needs to be included and analyzed in the Final EIS. FWS maintains a geospatial database with historic eagle nest locations (see Attachment 2). These data, which represent nests easily observed from roads and highways, are available for public and agency use. It should be noted that, although not a complete depiction of all eagles in the area, the map indicates records of approximately 1,074 bald and golden eagle nest sightings within the JPARC Region of Influence as described in the Draft EIS. The Final EIS also needs to more clearly identify the number of bald and golden eagles potentially at risk during nesting periods due to DoD activities along the definitive low-level flight paths.</p>	<p>A mitigation measure has been included for all the definitive proposals that may include ground disturbance: "Consult with USFWS with regard to compliance with Bald and Golden Eagle Protection Act and MBTA. As required, conduct bald and golden eagle nest surveys in proposed Fox 3 and Paxson MOAs over previously unsurveyed areas. Coordinate the results with USFWS."</p> <p>Since the DEIS, we have obtained more mapping data for eagles and will incorporate relevant results.</p>
G0015-4	<p>The Final EIS also needs to analyze mitigation measures to help ensure all nesting and/or molting migratory birds are not adversely impacted by low-level flights. Scientific literature indicates human-caused disturbance can change behavior and spatial distribution of waterfowl (Manci et al. 1988, Dalhlgren and Korschgen 1992). Effects include interruption of feeding (Madsen 1985, Ward et al. 1994), displacement from feeding areas (Kramer et al. 1979, Belanger and Bedard 1989, Conomy et al. 1998), and increased energy expenditure resulting from escaping behaviors (Korschgen et al. 1985, Jensen 1990). If disturbances are sufficiently frequent, disturbance may result in reduction of energy reserves (White-Robinson 1982, Belanger and Bedard 1990, Miller et al. 1994) important for migration (Owen and Black 1989), molt (Taylor 1993, 1995), and survival (Haramis et al. 1986). The Draft EIS acknowledges significant bird migration routes in Interior Alaska and identifies high-density areas of nesting waterfowl that underlie the Expanded Fox 3 and Paxson MOAs; page 3-47 notes "Habitat used by ducks, geese and trumpeter swans is especially important under the southwestern part of the Fox 3 expansion area and the southern part of the proposed Paxson MOA, coinciding with the larger river systems and marshy areas." The combined Fox 3 and Paxson MOAs cover more than 2 million acres of nationally-significant waterfowl nesting habitat. Most migratory bird nesting (and the associated post-nesting molt of adult birds) occurs in</p>	<p>Mitigation measures, best management practices (BMPs), and standard operating procedures (SOPs) that currently exist are given in Appendix G, with the intention that their language will be adapted to apply to specific JPARC actions subsequent to internal review.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds, which are published in a handbook. Pilots are aware of and attempt to avoid migratory bird congregation areas for their own safety (e.g., to avoid bird strikes) as well as to minimize disturbance to the animals.</p> <p>Text will be added to include additional information from the literature to address nesting and molting migratory birds, including waterfowl.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	Interior Alaska between April 15 and August 1. Prohibiting low-level flights (i.e., flights below 1,600 feet) between April 15 and August 1 (USFWS(2) 2007) could help reduce or eliminate the potential impact to nesting and molting migratory birds.	
G0015-5	Moreover, the Final EIS needs to provide and analyze information on the potential effects of aircraft overflights on nesting birds. While some studies have been conducted in Alaska on potential effects of aircraft on migratory birds; as noted below, the effects appear to differ widely among species of birds, and their potential habituation to aircraft disturbance. For example, Palmer et al. (2003) studied the effect of jet aircraft overflights on the parental care of peregrine falcons (<i>Falco peregrinus</i>) breeding along the Tanana River in Alaska during 1995-1997. Military jets flying at or below 150 meters (about 500 feet) in the vicinity of specific nest cliffs within established Military Training Routes caused only subtle differences in peregrine parental behavior, no significant differences in nest attendance patterns, and no reduction in productivity of nesting pairs (Nordmeyer 1999). Ward et al. (1999) observed the behavioral response of fall-staging flocks of Pacific Brant (<i>Branta bernicla nigricans</i>) and Canada geese (<i>B. canadensis taverneri</i>) to a variety of aircraft and found 75 percent of brant flocks and 9 percent of Canada goose flocks flew in response to overflights, with an inverse relation between altitude and response and with the greatest response occurring at aircraft altitudes between 305 and 760 meters (1,000 to 2,500 feet). In that study, lateral distance was a more consistent predictor of response than altitude, with the greatest disturbance occurring when aircraft were within a lateral distance of 1.6 kilometer (about 1 mile) to the flock. Please refer to Attachment 3 for citations of studies we believe will help facilitate analysis of the potential impacts of aircraft overflights on nesting birds. The resulting analysis needs to be included in the Final EIS.	We will review the additional references and add text to the FEIS, Appendix E, which contains a review of research on effects, primarily from aircraft overflights, on wildlife species.
G0015-6	We are concerned the newly proposed low-altitude MOA, extending from 500 to 5,000 feet above ground level (AGL) in both the Fox 3 and Paxson MOAs, could result in significant adverse impacts to nesting migratory birds. The "Definitive Actions" in the Draft EIS are vague and do not provide specific actions to protect a given resource. For example, the Proposed Mitigation for the Fox 3 and Paxson MOAs (Table K-2 on page K-9), states: "Consult with the USFWS with regard to compliance with Bald and Golden Eagle Act and MBTA. As required, conduct bald and golden eagle surveys in proposed Fox 3 and Paxson MOAs over previously unsurveyed areas.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	Coordinate the results with USFWS.” The Final EIS needs to clarify and specify proposed mitigation measures for “Biological Resources,” including nesting migratory birds. The most commonly-recommended best management practice for protecting nesting swans, other waterbirds, and raptors (as well as other wildlife) in the vicinity of aircraft overflight is to maintain aircraft operating guidelines limiting helicopter and fixed-wing overflights to a minimum of 400-500 meters (approximately 1,300-1,600 feet AGL) with no circling over nests or aggregations (Komenda-Zehnder et al. 2003, and Churchill and Holland 2003). The National Bald Eagle Management Guidelines (USFWS 2007) recommend helicopters and fixed-winged aircraft avoid eagle nests by 1,000 feet during the breeding season, except where eagles have demonstrated tolerance for that activity. DoD needs to consult with the FWS prior to completing the Final EIS to determine what specific protective mitigation will need to be included in the Final EIS to protect nesting migratory birds.	actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. The Air Force will be consulting with the USFWS prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect nesting raptors and other migratory birds. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.
G0015-7	We recommend that the footprint of the Fox 3 MOA, as described in Alternative E, be moved to the north by approximately 20 nautical miles to help reduce the negative effects on opportunities for solitude in the Lake Louise area.	Alternative E was created in response to public comments, in order to avoid impacts to the Lake Louise area. This comment is duly noted.
G0015-8	We are concerned that the flight ceiling for both the FOX 3 and Paxson MOAs in both Alternatives A and E has been lowered from 5,000 feet AGL to 500 feet AGL. It should be noted that the Bureau of Land Management (BLM), through its recreation program, has documented over the years, numerous encounters by recreational users of BLM-managed lands with military overflights. These encounters have included low level overflights in the current Fox 3 MOA on the Upper Tangle Lakes and Delta River; some of these encounters included shockwaves and loud noise associated with aircraft breaking the sound barrier. We believe a lower flight ceiling in the Fox 3 MOA, combined with the same lower flight ceiling in the proposed new Paxson MOA, would likely reduce opportunities for solitude on many of the lands BLM manages. With recreational visitation to developed facilities and backcountry trails on BLM-managed lands in this area and on the Gulkana and Delta Wild and Scenic Rivers annually exceeding 150,000 visitors, the Final EIS needs to include avoidance areas and mitigation measures that will preserve opportunities for solitude on the nationally-designated Gulkana and Delta Wild and Scenic Rivers and associated developed facilities for the Fox 3 and Paxson MOAs in both Alternatives A and E.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.

Table N-5. Government Response to Comments (*continued*)

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G0015-9	We recommend that the Final EIS identify a mechanism (e.g., telephone number or web site) for providing the public and land managers at least annually, or more often as appropriate, information on flights and maneuvers. This mechanism should be structured so that it offers the opportunity for recreational users to provide feedback to DoD, such as reports of non-compliance and/or complaints. This could also be used by both DoD and BLM for tracking issues and documenting successful mitigation.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0015-10	<p>Under the proposed action #6, newly created “corridors” between Eielson Air Force Base (AFB) to R-2211; Eielson AFB to R-2205; Allen Airfield to R-2202; R-2202 to R2211; R2205 to R2202; Fort Wainwright to R-2211; and Fort Wainwright to R-2205 would, in essence, create a virtual “wall” extending nearly 90 air miles from Fairbanks and Fort Greely. This virtual “wall” would go from 1,200 AGL to 17,999 AGL. DoD has indicated that these corridors would be in operation from 07:00-19:00 Monday through Friday, or as extended by a Notice to Airmen. It is our understanding that the purpose of these corridors is to allow operation of Unmanned Aircraft Systems (UAS). According to the Draft EIS, if the Army meets all Federal Aviation Administration requirements for UAS use in the National Air Space, the Certificate of Authorization process, as it currently stands, would shut down the airspace in these proposed corridors. However, even if military Unmanned Aerial Vehicle aircraft were outfitted with Mode-C transponders, most of the BLM Alaska Fire Service (AFS) air fleet and contracted aircraft do not have Traffic Collision Avoidance avionics.</p> <p>A virtual “wall” of this magnitude, as described in the Draft EIS, would likely result in significant negative effects on the BLM AFS and Alaska Department of Natural Resources Division of Forestry (DOF) joint aviation operations for fire management by cutting off access to the east for AFS and DOF, and cutting off access for DOF to the west. Three of the five wildland fire air tanker bases located in Alaska are on either side of this virtual “wall” in addition to all of the helitack and smokejumper bases. Furthermore, 1,200 to 17,999 AGL cuts off all Visual Flight Rules (VFR) traffic heading in either direction. As a result, only pressurized aircraft (the majority of which are not part of the BLM air fleet or their contracted fire management aircraft)</p>	<p>Many comments have been received regarding the potential for significant impacts the proposed UAV corridors may have on VFR and IFR aircraft transit through the affected areas when these corridors are active. EIS Sections 3.6.1 and 3.6.3 address those concerns and note that the potential impacts on other airspace uses would be a key consideration in scheduling only those corridors/altitude layers required to support individual Unmanned Aerial Vehicle (UAV) mission needs. As noted in the EIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near , mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users. Pending overall decisions on how this can be done and further evaluation by the FAA on the JPARC corridor proposals, it is imperative that the military proceed with identifying and evaluating those corridor options that would be required to support Army UAV missions. For that reason a Restricted Area designation was assessed for the proposal as the most restrictive option each may have on other airspace uses.</p> <p>Regarding your concern that the UAV proposal would create a virtual “wall” from 1,200 AGL to 17,999 MSL and result in significant negative effects on the BLM Alaska Fire Service (AFS) and Alaska Department of Natural Resources Division of Forestry (DOF) joint aviation operations for fire management by cutting off access to the east for AFS and DOF, and cutting off access for DOF to the west, please allow us to clarify the UAV proposal and demonstrate that access for fire safety will be available at all times. Corridors 8 nautical miles (NM) wide with proposed altitudes up to 17,999 feet MSL would be segmented into three altitude layers for use of only those</p>

Table N-5. Government Response to Comments (*continued*)

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	<p>could make the east-west transition, since only pressurized aircraft are capable of flying at altitudes of 18,000 and above.</p> <p>We believe DoD needs to include in the Final EIS, an alternative approach to UAS use of air space and corridors that does not negatively impact AFS/DOF aviation operations for fire management, which are essential to helping protect life and property during wildland fires. In order to eliminate this virtual “wall,” we recommend DoD continue the practice of moving UAS between MOAs and other special use air space via ground transportation.</p>	<p>altitudes required for specific UAV types/missions: 1,200 feet to 2,999 feet AGL, 3,000 feet AGL to 8,999 feet MSL, and 9,000 feet to 17,999 feet MSL. UAV operations could be conducted between 7:00 a.m. and 7:00 p.m., Monday-Friday with other times as stipulated by a Notice to Airmen (NOTAM). However, the Army intends only to activate the altitude layer(s) needed to support the individual UAV mission, turning off the restricted airspace once the UAV has transitioned through the corridor. These segmentations will allow AFS/DOF aviation operations for fire management, along with civilian pilots, to pass through at those altitudes not required for UAV missions. For example, if the 9,000 feet to 17,999 feet MSL segmentation is active, AFS/DOF, along with civilian pilots, can use the airspace in that area at any altitude below 8,999 feet MSL or above 18,000 feet MSL. If the 3,000 feet AGL to 8,999 feet MSL segmentation is active, ASF/DOF, along with civilian pilots, can use the airspace in that area at any altitude below 2,999 feet AGL or above 9,000 feet MSL. If the 1,200 feet to 2,999 feet AGL segmentation is active, ASF/DOF, along with civilian pilots, can use the airspace in that area at any altitude below 1,199 feet AGL or above 3,000 feet AGL.</p>
G0015-11	We appreciate the opportunity to comment on this document. For technical assistance or questions regarding threatened/endangered species or migratory birds (including bald and golden eagles), please contact Jewel Bennett at the Fairbanks FWS Field Office at 907-456-0324. For technical assistance or questions regarding BLM-managed lands, wildfire activities, or Wild and Scenic Rivers, please contact Serena Sweet at the Anchorage BLM State Office at 907-271-4543.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0015-12	Page 1-36, Line 42, Section 1.6.4.3.1 Federal Agencies with Jurisdiction by Law, United States Fish and Wildlife Service: The jurisdictional responsibility of the FWS for administration of the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act needs to be added to this section.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The information noted in the comment will be added as part of the Final EIS.
G0015-13	Pages 2-6 and 2-7, Section 2.1.1.1. Alternative A: The Draft EIS states that the flight ceiling for routine training exercises in Alternative E for the Paxson MOA would be limited to 13,000 feet Mean Sea Level (MSL) and above (see page 2-7), while the flight ceiling for routine training exercises in Alternative A is 14,000 feet MSL and above (see page 2-6). The Final EIS needs to clarify why the flight ceiling is lower in Alternative E than Alternative A, given that Alternative E was designed to “provide a greater separation from the airways, jet routes, and airfields located south of the	Thank you for noting this error as this was discovered after the DEIS was published and has been corrected to reflect 14,000 feet MSL for both alternatives.

Table N-5. Government Response to Comments (*continued*)

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	proposed airspace boundaries” (page 2-7). We believe the flight ceiling for routine training exercises in the Paxson MOA for Alternative E needs to at least match the flight ceiling for routine training exercises for the Paxson MOA in Alternative A at 14,000 feet MSL and above, and that this information needs to be included in the Final EIS.	
G0015-14	Page 3-13, Line 13, Section 3.1.1.3.1 Alternative A: To ensure accuracy, the reference to “fire” needs to be changed here, and throughout the Final EIS, to “wildland fire.”	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The word usage will be updated to reflect the appropriate terminology.
G0015-15	Page 3-30, Lines 23-26, Section 3.1.3.3.1 Alternative A, Bird/Wildlife-Aircraft Strike Hazards: The Draft EIS does not specify the “consideration of additional means for monitoring...heightened risks of bird strikes” in the Fox 3 and Paxson MOAs zones. The Final EIS needs to specify “limits that would be placed on low-altitude flight activities.” The BLM-managed lands within these proposed MOA expansions provide habitat for populations of sensitive species (e.g., trumpeter swan and golden eagle) that may be adversely affected due to bird strikes caused by military aircraft between the 500 to 2,500 foot AGL. The Final EIS also needs to include information on what scientific means would be used to track migrations of birds, since “anecdotally observing lots of birds” is insufficient. As identified in Bruderer (1997) and Gauthreaux and Belser (2003), use of radar equipment can help in determining when large flights of birds are traveling north before and/or during Major Flying Exercise (MFEs) and regular training events. In addition, monitoring weather systems, especially wind speed and direction, can also help determine when to expect higher frequencies of migrations (Gauthreaux and Belser 2003).	Because bird/wildlife-aircraft strikes can present a serious hazard to all aircraft operations, the military will use the necessary means available as part of their BASH programs to detect and avoid those areas where there may be a potential flight safety risk. Additional details were included in the FEIS to reflect the information noted in the comment, as applicable.
G0015-16	Page 3-31, Line 4, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “wildlife fires” needs to be corrected in the Final EIS to read “wildland fire” and “wildfire management” needs to be corrected to read “wildland fire management.”	The text will be changed in the Final EIS to address the comment.
G0015-17	Page 3-31, Line 6, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “fire management” needs to be corrected in the Final EIS to read “wildland fire management.”	The text will be changed in the Final EIS to address the comment.
G0015-18	Page 3-49, Lines 25-29, Section 3.1.8.3.1 Alternative A: The Final EIS needs to ensure that the proposed Fox 3 and Paxson MOAs include the 3,000-foot AGL overflight buffer over the Nelchina Caribou Herd Calving Grounds (represented in Figure 3.5 on page 3-41) annually from May 15 to June 15. This also corresponds with Wolfe et al. 2000, who recommends	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	minimizing disturbance during critical stages (i.e., calving season) when cows were the most susceptible to elevated energy requirements.	<p>and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the ADF&G prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0015-19	Page 3-50, Lines 2-3, Section 3.1.8.3.1 Alternative A: We recommend maintaining in the Final EIS, a limitation of supersonic operations at altitudes of 5,000 feet AGL, or 12,000 feet MSL to help minimize noise disturbance to wildlife inhabiting the area when operations take place.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The limitation on supersonic operations noted in this comment is the current restriction for the Fox 3 MOA and would apply to the expanded MOA.</p>
G0015-20	Page 3-50, Line 35, Section 3.1.8.4 Mitigations: In addition to all mitigation measures listed, the Final EIS needs to include an extension of “established noise sensitive areas” (see Figure D-3 on page D-13) that encompasses the west fork of the Gulkana National Wild and Scenic River. This extension is necessary due to the high number of active Bald Eagle nests located in that area, as identified by BLM productivity surveys conducted there every three years.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (*continued*)

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		The Final EIS incorporates additional eagle nesting data that was available. The Air Force will complete consultation with the U.S. Fish and Wildlife Service prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect nesting raptors and other migratory birds. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.
G0015-21	Page 3-50, Line 35, Section 3.1.8.4 Mitigations: The Final EIS needs to include the Dall sheep lambing area within the Clearwater Mountains and establish a noise sensitive area in that identified location. Identified Dall sheep spring mineral licks also need to be included in the established seasonal flight avoidance areas within the Clearwater Mountain area and upper Susitna drainages.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0015-22	Page 3-99, Lines 17-18, Section 3.1.13.4 Mitigations, first bullet: We believe that use of aircraft, which has been determined as a customary and traditional use for all federal subsistence communities affected by the Fox 3 and Paxson MOAs expansion/creation, may be significantly affected during open federal subsistence hunting from August 1 through August 31, October 1 through November 30, and January 1 through March 31 (caribou season). Therefore, we recommend in the Final EIS, an extension of the time frame for “No MFEs” to cover the period of August 1 through September 30 in the Fox 3 and Paxson MOAs to avoid the federal subsistence moose season and the first half of the federal subsistence caribou season, the most intensively hunted season. Since the Fox 3 and Paxson MOAs encompass most of unencumbered BLM lands open to federal subsistence hunting, this would help ensure that potential adverse effects on federal subsistence use would be	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	minimized.	management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.
G0015-23	Page 3-99, Lines 26-29, Section 3.1.13.4 Mitigations, fourth bullet: The Final EIS needs to (1) specify the time frames for this proposed mitigation; i.e., “Conduct regular meetings with regulating agencies...” and (2) identify what thresholds would be required for the USAF to “adjust flight avoidance locations, or to add new ones.”	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0015-24	Page 3-237, Line 15, Section 3.4.8.1 Affected Environment, Table 3-50: This table references a U.S. Geological Survey (USGS) 2011 publication; however, the publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.	This appears to be a typo and needs to be changed to “USGS 1991”, which refers to the vegetation land cover GIS data that we used to generate all vegetation tables.
G0015-25	Page 3-330, Lines 23-24, Section 3.7.6.1 Affected Environment: The Draft EIS references USGS surface-water discharge data (USGS 2011-1); however, the data publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.	The USGS 2011-1 reference will be added to Section 6 in the Final EIS.
G0015-26	Page 4-27, Line 3, Section 4.8.8 Biological Resources: The Final EIS needs to more fully discuss cumulative impacts to biological resources in the Fox 3 and Paxson MOAs and adjacent areas. With new mineral exploration, large hydropower projects (e.g., the Susitna-Watana project), new oil/gas pipelines, and various other land developments in place or reasonably foreseeable, the cumulative effects of all of these land decisions, in addition to these airspace/temporary ground structures, could have a significant and synergistic effect on many biological resources. Therefore, we believe both direct and indirect cumulative effects issues; geographic scope; timeframe; and past, present, and reasonably foreseeable actions, need to be more fully analyzed for the proposed expansion of Fox 3 and Paxson MOAs.	The FEIS includes additional projects and actions identified during the public comment period, including the Susitna-Watana project, that may overlap with the JPARC region of activities. Additional evaluation of potential cumulative effects is included in Chapter 4 of the FEIS, particularly for the area coinciding with the proposed expanded Fox 3 and Paxson MOAs. The analysis acknowledges that this area will come under increasing pressures from human activities, and these could have potentially significant impacts on multiple resources including wildlife, qualities of solitude, hunting and recreational opportunities and access for various productive uses.
G0015-27	Pages D-15 and 16, Table D-6 Flight Avoidance Areas: The Table D-6 Flight Avoidance Area entry for row #36 is incorrect. This needs to be corrected in the Final EIS to read “Gulkana” and not “Juliana” National Wild and Scenic River.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The noted entry will be corrected in the Final EIS.

Table N-5. Government Response to Comments (*continued*)

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G0015-28	While we agree with the Flight Avoidance Areas depicted in Table D-6 for both the Delta and Gulkana National Wild and Scenic River areas (row 19 and row 36 [as corrected], respectively); we believe that the flight ceiling for those areas needs to be changed in the Final EIS to 5,000 feet AGL, rather than 5,000 feet MSL. Because much of the land underneath the Fox 3 and Paxson MOAs is at an elevation of approximately 1,500 to 3,000 feet above sea level (e.g., Paxson is approximately 2,500 feet above sea level), a 5,000 feet MSL ceiling is effectively only 2,000 to 3,500 feet AGL. To preserve the opportunity for solitude, overflight operations in the vicinity of the Gulkana and Delta Wild and Scenic Rivers would need to occur at least 5,000 feet AGL.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0015-29	In addition, we believe the flight avoidance times of year need to be expanded to include the busy summer recreation and fall hunting seasons. Therefore, the proposed avoidance time of year for the Gulkana and Delta Wild and Scenic Rivers needs to be changed in the Final EIS from June 27 through July 11 to May 15 through September 30. These dates more closely match many of the dates for the other avoidance areas listed, and would offer more opportunities for solitude, since most of BLM's busiest recreational facilities, as well as the Gulkana Wild and Scenic River, would be underneath the new Paxson MOA.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-30	Pages K-19, 23, and 24, Table K-2 Proposed Mitigations: We believe "Land Use-Recreation" and "Land Use" mitigations identified to occur from June 27 to July 11 and from August 20 to September 30 for MFE operations in the Fox 3 and Paxson MOAs need to be changed in the Final EIS to include the dates of May 15 through September 30. The May 15 through September 30 timeframe dates more closely match many of the dates for the other avoidance areas listed, and offer more opportunities for solitude since most of BLM's busiest recreational facilities as well as the Gulkana Wild and Scenic River would be contained underneath the new Paxson MOA.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-31	<p>Page K-20, Table K-2 Proposed Mitigations: While we support the avoidance area extending five nautical miles on either side of both the Gulkana and Delta Wild and Scenic River areas, in order to preserve solitude, a 5,000-foot AGL (rather than a 5,000 foot MSL) flight ceiling needs to be included in the Final EIS. We also believe the Final EIS needs to indicate that the expanded avoidance area will be in effect from May 15 through September 30 annually.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0015-32	<p>Page K-21, Table K-2 Proposed Mitigations: The Final EIS needs to identify a flight ceiling of 5,000 feet AGL, an avoidance area extending 5 nautical miles, and a timeframe to include May 15 through September 30 for the “Land Use-Recreation” mitigation. This will ensure consistency with previous comments regarding BLM-managed lands and subsistence use areas.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-33	<p>Page K-25, Table K-2 Proposed Mitigations: Because of the importance of reducing or eliminating the potential to ignite wildfires on BLM (and other) lands within these MOAs, we support the mitigations for the release of flares</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	and chaff in the Fox 3 and Paxson MOAs, and recommend specifying in the Final EIS, a release altitude of at least 2,000 feet AGL between October and May, and 5,000 feet AGL between June and September.	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-34	<p>Attachment 2 Map of Historic Eagle Nest Locations [Map]</p> <p>NOTE: GIS shape files and maps to be used in analysis for the Final EIS are available through the Fairbanks Fish and Wildlife Service Field Office. Please contact Jewel Bennett at 907-456-0324.</p>	We have received additional eagle nest data and will analyze with regard to the definitive proposals in the Final EIS.
G0015-35	<p>Attachment 3 References</p> <p>Belanger, L., and J. Bedard. 1989. Responses of staging greater snow geese to human disturbance. <i>Journal of Wildlife Management</i> 53:713-719.</p> <p>Belanger, L., and J. Bedard. 1990. Energetic cost of man-induced disturbance to staging snow geese. <i>Journal of Wildlife Management</i> 54:36-41.</p> <p>Bruderer, B. 1997. The study of bird migration by radar, part 2: major achievements. <i>Naturwissenschaften</i> 84: 45–54.</p> <p>Churchill, B., and B. Holland. 2003. Wildlife and aircraft operation: assessment of impacts, mitigation and recommendations for best management practices in the Peace Region. Peace Region, Ministry of Water, Land and Air Protection. Fort St. John B.C. 77 pp.</p> <p>Conomy, John T., J.A. Dubovsky, J.A. Collazo, and W.J. Fleming. 1998.</p>	<p>Thank you for the references; approximately 40 percent of those listed were reviewed along with many more and presented in Appendix E as a review of research on noise effects, primarily from aircraft overflights, on wildlife species. DEIS Sections 3.1.8.3 and 3.1.8.4 provide the most thorough impact analysis and mitigations with regard to low-level aircraft overflight and noise (Fox/Paxon MOAs).</p> <p>Text will be added to include additional information from the literature to address nesting and molting migratory birds, including waterfowl, in the Final EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Do Black Ducks and Wood Ducks Habituate to Aircraft Disturbance? The Journal of Wildlife Management, Vol. 62, No. 3 (Jul., 1998), pp. 1135-1142.</p> <p>Dahlgren, R. B., and C. E. Korshgen. 1992. Human disturbances to waterfowl: an annotated bibliography. U.S. Fish and Wildlife Service Biological Report 188.</p> <p>Gauthreaux, S.A. and Belser, C.G. 2003. Radar ornithology and biological conservation. Auk 120: 266-77.</p> <p>Haramis, G. M., J. D. Nichols, K. H. Pollock, and J. E. Hines. 1986. The relationship between body mass and survival of wintering canvasbacks. Auk 103:506-514.</p> <p>Jensen, K. C. 1990. Responses of molting Pacific black brant to experimental aircraft disturbance in the Teshekpuk Lake Special Area, Alaska. Dissertation, Texas A&M University, College Station, Texas, USA.</p> <p>Komenda-Zehnder, Susanna, M. Cevallos, and B. Bruderer, Prof. Dr. 2003. Effects of Disturbance by Aircraft Overflight on Waterbird – An Experimental Approach. International Bird Strike Committee. Warsaw 5-9, May. 12 pp.</p> <p>Korschgen, C. E., L. S. George, and W. L. Green. 1985. Disturbance of diving ducks by boaters on a migrational staging area. Wildlife Society Bulletin 13:290-296.</p> <p>Kramer, G. W., L. R. Rauen, and S. W. Harris. 1979. Populations, hunting mortality, and habitat use of black brant at San Quintin Bay, Baja California, Mexico. Pages 242-254 in R. L. Jarvis and J. C. Bartonek, editors. Management and biology of Pacific Flyway geese: a symposium. OSU Book Stores, Corvallis, Oregon, USA.</p> <p>Madsen, J. 1985. Impact of disturbance on field utilization of pink-footed geese in west Jutland, Denmark. Biological Conservation 33:53-63.</p> <p>Manci, K. M., D. N. Gladwin, R. Villella, and M. G. Cavendish. 1988. Effects of aircraft noise and sonic booms on domestic animals and wildlife: a literature synthesis. U.S. Fish and Wildlife Service Report</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>88/29.</p> <p>Miller, M. W, K. C. Jensen, W. E. Grant, and M. W. Weller. 1994. A simulation model of helicopter disturbance of molting Pacific black brant. <i>Ecological Modeling</i> 73:293-309.</p> <p>Navy 2011. Gulf of Alaska Navy Training Activities Environmental Impact Statement/Overseas Environmental Impact Statement.</p> <p>Nordmeyer, D.L. 1999. Effects of jet aircraft overflights and other potential disturbances on behavioral responses and productivity of nesting peregrine falcons. Thesis, United States Geological Survey-Oregon Cooperative Fish and Wildlife Research Unit and Department of Fisheries and Wildlife, Oregon State University, Corvallis, USA.</p> <p>Owen, M., and D J. Black. 1989. Factors affecting the survival of barnacle geese on migration from the breeding grounds. <i>Journal of Animal Ecology</i> 58: 603-617.</p> <p>Palmer, Angela G., D.L. Nordmeyer, and D.D. Roby. 2003. Effects of Jet Aircraft Overflights on Parental Care of Peregrine Falcons. <i>Wildlife Society Bulletin</i>, Vol. 31, No. 2. pp. 499-509.</p> <p>Taylor, E. J. 1993. Molt and bioenergetics of Pacific black brant (<i>Branta bernicla nigricans</i>) on the Arctic Coastal Plain, Alaska. Dissertation, Texas A&M University, College Station, Texas, USA.</p> <p>Taylor, E. J. 1995. Molt of black brant (<i>Branta bernicla nigricans</i>) on the Arctic Coastal Plain, Alaska. <i>Auk</i> 112:904-919.</p> <p>USFWS. U.S. Fish and Wildlife Service. 2007. National Eagle Management Guidelines. 23 pp. http://alaska.fws.gov/eaglepermit/pdf/national_guidelines.pdf</p> <p>USFWS (2). U.S. Fish and Wildlife. 2007. ADVISORY: Recommended Time Periods for Avoiding Vegetation Clearing in Alaska in order to Protect Migratory Birds at http://alaska.fws.gov/fisheries/fieldoffice/anchorage/pdf/vegetation_clearing.pdf</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Ward, David H.; R.A. Stehn, W.P. Erickson, and D.V. Derksen. 1999. Response of Fall-Staging Brant and Canada Geese to Aircraft Overflights in Southwestern Alaska. The Journal of Wildlife Management, Vol. 63, No. 1. pp. 373-381.</p> <p>Ward, D.H., R. A. Stehn, and D. V. Derksen. 1994. Response of staging brant to disturbance at the Izembek Lagoon, Alaska. Wildlife Society Bulletin 22:220-228.</p> <p>White-Robinson, R. 1982. Inland and saltmarsh feeding of wintering brant geese in Essex. WildFowl 33:113-118.</p> <p>Wolfe, S.C., Griffith, B., and Gray Wolfe, C.A. 2000. Response of reindeer and caribou to human activities. Polar Research 19:63-73.</p>	
G0016-1	<p>The City of North Pole (CONP) would like to take this opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the joint Pacific Alaska Range Complex (JPARC) in Alaska.</p> <p>The City of North Pole supports the U.S. Air Force and Army and their missions in Alaska and recognizes the need for expanding JPARC to accommodate current and future training needs. The CONP supports the increased use of JPARC, and the planned expansion as it represents no overall negative impact on the community. However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.</p> <p>The JPARC ranges and facilities far surpass the quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The CONP is proactive in addressing military concerns on JPARC</p>	<p>Thank you for your comment highlighting the capabilities proposed for the JPARC in this EIS. The Army and Air Force will continue to work closely and cooperatively with the State of Alaska to enhance both the JPARC and State resources for the benefit of the state and its citizens.</p> <p>The proposed relocation of the F-16 Aggressor Squadron from Eielson AFB to Joint Base Elmendorf-Richardson (JBER) is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. Therefore, the relocation of the F-16 Aggressor Squadron is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action, and a separate NEPA document will be prepared to address the impacts of the restructuring program. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s can initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats, regardless of AGL, where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals, and ALCOM does</p>

Table N-5. Government Response to Comments (*continued*)

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	<p>utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.</p> <p>The CONP believes it is necessary for the State of Alaska and the Department of Defense to continue working closely and cooperatively in order to enhance both the use of the JPARC and the development of the natural resources located within the JPARC, and surrounding environs, for the benefit of the State and its citizens.</p> <p>The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base(Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC training scenarios and conduct, and could affect our community's support for JPARC use and expansion. The CONP's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.</p> <p>Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS</p> <p>While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.</p> <p>The JPARC EIS was prepared for anticipated scenarios exclusive of the</p>	<p>not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including major flying exercises such as RED FLAG Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.</p> <p>The following concerns arise based on the proposed airspace expansions:</p> <ol style="list-style-type: none"> 1. Cost for "dry targets" in the new airspace. 2. Transit distance for Aggressors to the YUKON range airspace. 3. Travel time vs. play time in the proposed airspace. 4. Erroneous assumption that airspace entry equates to effective airspace use. <p>The following considerations arise related to environmental analysis and aircraft relocation:</p> <ol style="list-style-type: none"> 1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace. 2. The JPARC EIS in no way considers the relocation of the Aggressors. 3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing. 4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER. 5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually. 6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL. <p>The following considerations arise concerning estimated cost savings:</p> <ol style="list-style-type: none"> 1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie. 2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally 	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>utilized ATC routing.</p> <p>3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER.</p> <p>4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft.</p> <p>Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER to the YUKON1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.</p> <p>In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, Special Use Airspace. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.</p> <p>In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.</p> <p>Expanded Data Points</p> <p>Airspace Expansions:</p> <p>1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal</p>	

Table N-5. Government Response to Comments (*continued*)

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	<p>lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred.</p> <p>2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates – points on the boundaries of the airspace where ATC can initiate or terminate IFR/VFR clearances and issue airspace clearances. These gates can be likened to the ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.</p> <p>The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STOON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.</p> <p>The possible solutions to the issue of transit distance include, but are not limited to:</p> <p>1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.</p> <p>3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEGL TWO SID from JBER requires approximately 15</p>	

Table N-5. Government Response to Comments (*continued*)

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	<p>minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA, FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.</p> <p>4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation. Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.</p> <p>Environmental Study:</p> <p>1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kullis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kullis relocation, involved replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kullis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kullis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area).</p> <p>2. Chapter 4, Cumulative Impacts and Secondary Effects, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is</p>	

Table N-5. Government Response to Comments (continued)

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

Table N-5. Government Response to Comments (*continued*)

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	<p>6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSL) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in nonMFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.</p> <p>Cost savings:</p> <p>1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.</p> <p>2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1ATCAA/MOA. The</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.</p> <p>One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.</p> <p>3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.</p> <p>4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves - greater reserves for IFR terminal weather - and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.</p> <p>Thank you for the opportunity to offer comment on the Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska. The CONP looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.</p> <p>References:</p> <p>Air Force (U.S. Air Force). 2010. 11th Air Force Airspace Handbook. 29 December.</p> <p>ALCOM (Alaskan Command). 2012. Joint Pacific Alaska Range Complex</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Environmental Impact Statement, Joint Base Elmendorf Richardson, Alaska. March.</p> <p>FAA (Federal Aviation Administration). 2011. Administrator's Fact Book, U.S. Department of Transportation. March.</p> <p>FAA (Federal Aviation Administration). 2012. Form 5010, Airport Master Record, Fairbanks, U.S. Department of Transportation. May. Website http://www.gcr1.com/5010web/REPORTS/AFD05312012FAI.pdf. Accessed June 2012.</p>	
G0016-2	<p>Review and Comments from the CONP on the Draft JPARC EIS</p> <p>The CONP joins with the Fairbanks North Star Borough (FNSB) in the following comments. We understand that four factors are driving the need for enhanced and modernized training and testing facilities at JPARC. These four factors are technological advances; changes in combat tactics and techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the CONP's comments are arranged in a similar format.</p> <p>Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion</p> <p>Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.</p>	<p>Both the Army and Air Force appreciate the support both North Pole and the North Star Borough have shown the military. The concerns and recommendations presented in the comment are greatly appreciated and would all be taken into account while trying to find the solutions that would best serve both civil and military aviation needs. The Air Force recognizes the need to enhance communications to better inform all public interests of the airspace uses; identify means for ensuring safe passage of VFR aircraft through those areas where terrain, weather, and other conditions may be a concern when the proposed airspace is active; and seek means for transiting IFR flights through this active airspace when necessary. All these concerns will also be considered by the FAA in their study of the preferred airspace actions noted in the FEIS, while determining how each proposal can be implemented and managed with minimal adverse effects on other airspace uses and the Air Traffic Control system. The Army and Air Force will continue to work with commercial and general aviation constituents to resolve those concerns raised during both the scoping and DEIS public comment periods.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.</p> <p>While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date -- fifteen years after the MOAs were expanded -- aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p> <p>Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.</p> <p>Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,</p> <p>(b) Mitigations include raising the floor any time a station is down or the</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.</p> <p>Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.</p> <p>Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p> <p>Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.</p> <p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The CONP has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.</p> <p>Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.</p> <p>When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.</p> <p>Proposed Realistic Live Ordnance Delivery in proposed restricted area</p> <p>The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p> <p>Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting ,access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.</p> <p>The CONP supports Alternative B. Alternative B allows for greater</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.</p> <p>Proposed Battle Area Complex Restricted Area</p> <p>The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.</p> <p>Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.</p> <p>The CONP supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.</p>	
G0016-3	<p>...</p> <p>The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace. Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system.</p>	<p>The importance of civilian aviation as a key industry to the economy of the area surrounding the proposed airspace is recognized in Section 3.1.12.1. The economic impacts of commercial and other civil aviation impacts from the Fox 3 Expansion/New Paxon proposed actions are addressed in Section 3.1.12.3. The recommendation made will be considered as a potential mitigation. In addition, the Air Force will continue to coordinate with the FAA and other regulatory agencies to address stakeholder concerns further.</p>
G0016-4	<p>...</p> <p>When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP</p>	<p>As noted in Section 3.2.10.3 of the EIS, due to safety regulations, the proponent would restrict ground access to all nonparticipating individuals and would provide evacuation notice to all persons with surface interests in the areas under the expanded airspace, outside of DoD boundaries during periods</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.</p> <p>Proposed Realistic Live Ordnance Delivery in proposed restricted area The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas. Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202. The CONP supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops</p>	<p>of hazardous operations. Section 3.2.10.4 of the EIS lists mitigation measures that could be implemented to reduce the impacts to hunting, including suspension of Air Force MFE operation during January, September, and December and between June 27 and July 11 within the proposed restricted areas associated with the Realistic Live Ordinance proposal to allow access for public use and recreation. The Air Force would publish advance notification of the schedule and where and when ground access restrictions occur, in order for individuals to plan for these closures.</p> <p>Your opposition to any option that connects Restricted Areas 2211 and 2202 and support for Alternative B are noted.</p>
G0016-5	<p>Proposed Expansion of R-2205 Restricted Area, including the DMPTR The CONP supports the expansion of the R-2205 Restricted Area; the airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.</p> <p>Proposed Night Joint Training in all military special use airspace The CONP supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.</p> <p>....</p> <p>Proposed Enhanced Access to Ground Maneuver Space Areas The CONP supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The CONP played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the CONP was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.</p> <p>Proposed Tanana Flats Training Area Access Road The CONP supports construction of the Tanana Flats Training Access Road to access the Ground</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.</p> <p>Proposed Joint Air-Ground Integration Complex The CONP supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.</p> <p>Proposed Intermediate Staging Bases The CONP supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.</p> <p>Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska The CONP supports use of the Gulf of Alaska for training with AIM-9 and AIM-120 missiles.</p> <p>Proposed Joint Precision Airdrop System The CONP supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.</p>	
G0016-6	<p>Proposed Unmanned Aerial Vehicle (UAV) Corridors</p> <p>The CONP is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the CONP would like the final JPARC EIS to develop other options besides segregated airspace.</p> <p>Recommendation: While awaiting development of a FAA-certified sense-</p>	<p>Your active participation in supporting those means that can best accommodate UAV test and training efforts in our regions is greatly appreciated. The potential effects each proposed corridor may have on other aircraft would be a key consideration in scheduling only those corridors/altitude layers required to support individual UAV mission needs. As noted in the FEIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near-, mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users. Pending overall decisions on how this can be done and further evaluation by the FAA on the JPARC corridor proposals, it is imperative that the military proceed with identifying and evaluating those corridor options that would be required to support Army UAV missions. Restricted areas designations were proposed and assessed as the most restrictive option each</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.</p> <p>The CONP supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The CONP is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The CONP is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.</p>	<p>corridor may have on other airspace uses.</p>
G0016-7	<p>Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion</p> <p>Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.</p> <p>The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>economic impact on military training.</p> <p>While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date -- fifteen years after the MOAs were expanded -- aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p> <p>Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.</p> <p>Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,</p> <p>(b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.</p> <p>Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>upgrades of aviation communication and navigation systems.</p> <p>Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p> <p>Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.</p> <p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The CONP has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.</p> <p>Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.</p> <p>When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.</p>	
G0016-8	<p>Proposed Realistic Live Ordnance Delivery in proposed restricted area</p> <p>The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p> <p>Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0016-9	<p>Proposed Unmanned Aerial Vehicle (UAV) Corridors</p> <p>The CONP is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the CONP would like the final JPARC EIS to develop other options besides segregated airspace.</p> <p>Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.</p> <p>The CONP supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The CONP is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The CONP is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.</p>	<p>prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Army will coordinate with FAA on details of implementation for this proposal. Because the issues concerning UAVs are arising across the National Airspace System, FAA is giving careful consideration to how to provide a safe environment for this growing need. Their final approval will likely reflect a comprehensive approach.</p>
G0017-1	<p>As Mayor of the Fairbanks North Star Borough (FNSB) I would like to take this opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the joint Pacific Alaska Range Complex (JPARC) in Alaska.</p> <p>The FNSB wholeheartedly supports the U.S. Air Force and Army and their missions in Alaska and welcomes the expansion of the JPARC to accommodate current and future training needs. The FNSB supports the increased use of JPARC, and the planned expansion as this action is beneficial to the community, Alaska Command, and the U.S. Military with no overall negative impact on the community.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>
G0017-2	<p>However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.</p>	<p>This JPARC EIS does not propose any changes to "force structure." All proposals in this EIS assume status quo for overall aircraft and sortie counts and no change in personnel at the two Air Force bases. Any significant change to basing or operations will require additional environmental actions.</p>
G0017-3	<p>The JPARC ranges and facilities located within the FNSB far surpass the</p>	<p>Thank you for taking part in the public and agency review process for the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The FNSB is proactive in addressing military concerns on JPARC utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.	JPARC Draft EIS. This comment is duly noted.
G0017-4	The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC training scenarios and conduct, and could affect our community's support for JPARC use and expansion.	The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This action would require a separate NEPA document to address the impacts of the restructuring program. An F-16 relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of any F-16 relocation and military training adjustments, including Major Flying Exercises such as RED FLAG Alaska, are under consideration in the coming months, but there are no current proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft.
G0017-5	<p>The FNSB's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.</p> <p>Review and Comments from the FNSB on the Draft JPARC EIS techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the FNSB's comments are arranged in a similar format.</p>	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0017-6	<p>Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion</p> <p>Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.</p> <p>The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.</p> <p>While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date -- fifteen years after the MOAs were expanded -- aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p>	<p>Many concerns have been expressed over the potential impacts the proposed Fox 3 and Paxon MOAs may have on all current users of this airspace as noted in the comment. The Air Force would be giving full consideration to those mitigation measures noted in the FEIS and other viable options needed for minimizing these impacts while serving both civil aviation and military airspace needs. The Air Force will strive to identify solutions to accomplish the objectives to include SUAIS and other communications enhancements within those areas where this coverage may be lacking.</p>
G0017-7	<p>Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>minimize the risk of mid-air collision.</p> <p>Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,</p> <p>(b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.</p> <p>Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The FNSB is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.</p>	<p>and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p>
G0017-8	<p>Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p>	<p>Concerns with the potential impacts of the different airspace proposals on the Isabel Pass and other areas would be addressed through the proposed mitigations and ongoing communications with civil aviation interest groups to find those solutions that would best serve civil and military needs. Such concerns will also be examined by the FAA in their study of the preferred alternative to determine if and how each airspace action can be implemented and managed to minimize impacts on air traffic and their Air Traffic Control system capabilities.</p>
G0017-9	<p>Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0017-10	<p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The FNSB has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.</p>	<p>Pending the FAA's study of the preferred airspace proposals and conclusions for implementing these airspace actions, the Air Force would help seek those means that would minimize adverse effects on lifeguard repositioning flights, wildfire suppression logistical flights, and other air traffic requiring priority IFR access through the active airspace. In preparing the Final Environmental Impact Statement (FEIS) the Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible.</p>
G0017-11	<p>Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0017-12	<p>When military exercises are planned that would close either MOA, the FNSB would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. FNSB residents</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0017-13	<p>Proposed Realistic Live Ordnance Delivery in proposed restricted area</p> <p>The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p>	<p>Section 3.2.10.1 of the EIS acknowledges that recreational and mineralized areas occur within the project area for the Realistic Live Ordinance proposal. Section 3.2.10.3 of the EIS acknowledges that due to safety regulations, the proponent would restrict ground access to all nonparticipating individuals and would provide evacuation notice to all persons with surface interests in the areas under the expanded airspace, outside of DoD boundaries during periods of hazardous operations.</p>
G0017-14	<p>Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0017-15	<p>The FNSB supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0017-16	<p>Proposed Battle Area Complex Restricted Area</p> <p>The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.</p>	<p>Your concerns over VFR aircraft transit through the Isabel Pass and the effects that weather and other conditions can have on VFR passage through this area were acknowledged in the FEIS analysis of the Battle Area Complex proposal. The potential impacts this proposed restricted area could have on this corridor would be further examined by the FAA and the Army in their review of this proposal. Flight safety is of utmost importance in all the JPARC airspace proposals and all options would be explored to prevent any flight risks to all users of this airspace environment.</p>
G0017-17	<p>Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0017-18	<p>The FNSB supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
G0017-19	<p>Proposed Expansion of R-2205 Restricted Area, including the DMPTR</p> <p>The FNSB supports the expansion of the R-2205 Restricted Area; the</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.	includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-20	Proposed Night Joint Training in all military special use airspace The FNSB supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-21	Proposed Unmanned Aerial Vehicle (UAV) Corridors The FNSB is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the FNSB would like the final JPARC EIS to develop other options besides segregated airspace.	As noted in our response to Mayor Isaacson's comment on the UAV corridor proposals, the FNSB's interest and support of the UAV test and training programs are greatly appreciated. Recognizing that the FAA and DoD are still exploring those means for safely and effectively integrating UAV operations into the National Airspace System, the military must proceed with identifying and assessing those airspace needs required to support UAV training requirements. The FEIS examined restricted area designations as the most restrictive option in having potential impacts on other airspace uses in the affected areas. Pending the FAA's study of each corridor proposal, the Army would consider those FEIS mitigations and other viable options for minimizing effects on other air traffic, to include scheduling use of only those corridors/altitudes required to support each UAV mission activity.
G0017-22	Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. The Army will coordinate with FAA on details of implementation for this proposal. Because the issues concerning UAVs are arising across the National Airspace System, FAA is giving careful consideration to how to provide a safe environment for this growing need. Their final approval will likely reflect a comprehensive approach.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0017-23	The FNSB supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The FNSB is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The FNSB is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.	This comment is duly noted. As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
G0017-24	Proposed Enhanced Access to Ground Maneuver Space Areas The FNSB supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The FNSB played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the FNSB was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-25	Proposed Tanana Flats Training Area Access Road The FNSB supports construction of the Tanana Flats Training Access Road to access the Ground Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-26	Proposed Joint Air-Ground Integration Complex The FNSB supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-27	Proposed Intermediate Staging Bases The FNSB supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-28	Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska The FNSB supports use of the Gulf of Alaska for training with AIM-9 and	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	AIM-120 missiles.	includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-29	Proposed Joint Precision Airdrop System The FNSB supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-30	<p>Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS</p> <p>While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.</p> <p>The JPARC EIS was prepared for anticipated scenarios exclusive of the proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.</p> <p>The following concerns arise based on the proposed airspace expansions:</p> <ol style="list-style-type: none"> 1. Cost for "dry targets" in the new airspace. 2. Transit distance for Aggressors to the YUKON range airspace. 3. Travel time vs. play time in the proposed airspace. 	<p>Thank you for your time, thought, and effort into the analysis of the proposed relocation of the F-16 Aggressor Squadron from Eielson AFB to JBER. The Air Force has determined, however, the relocation of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 and fifth generation fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation fighters would be engaged. These fighters have the capability to reach out at greater distances than fourth generation fighters, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude that the existing MOAs do not provide. These aircraft must train to combat all such threats regardless of where the aggressor aircraft are based. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the coming months. The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. An environmental analysis will be prepared to address the potential environmental consequences of the proposed F-16 relocation within Alaska.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>4. Erroneous assumption that airspace entry equates to effective airspace use.</p> <p>The following considerations arise related to environmental analysis and aircraft relocation:</p> <ol style="list-style-type: none"> 1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace. 2. The JPARC EIS in no way considers the relocation of the Aggressors. 3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing. 4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER. 5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually. 6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL. <p>The following considerations arise concerning estimated cost savings:</p> <ol style="list-style-type: none"> 1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie. 2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally utilized ATC routing. 3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER. 4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft. <p>Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>to the YUKON1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.</p> <p>In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, Special Use Airspace. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.</p> <p>In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.</p> <p>Expanded Data Points</p> <p>Airspace Expansions:</p> <ol style="list-style-type: none"> 1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred. 2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates - points on the 	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>boundaries of the airspace where ATC can initiate or terminate IFR/VFR clearances and issue airspace clearances. These gates can be likened to the ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.</p> <p>The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STOON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/ PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.</p> <p>The possible solutions to the issue of transit distance include, but are not limited to: 1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.</p> <p>3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEEGL TWO SID from JBER requires approximately 15 minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA, FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.</p> <p>4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.</p> <p>Environmental Study:</p> <ol style="list-style-type: none"> 1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kullis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kullis relocation, involved replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kullis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kullis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area). 2. Chapter 4, Cumulative Impacts and Secondary Effects, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15). 3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. 	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressors originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.</p> <p>4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, Description and Representative Annual Use of Alaska Training Airspace, reflects FOX3 sortie totals of 9,877. STONY ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16CJs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.</p> <p>5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.</p> <p>6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSL) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in non-MFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.</p> <p>Cost savings:</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.</p> <p>2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.</p> <p>One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.</p> <p>3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data</p>	

Table N-5. Government Response to Comments (continued)

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	<p>sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.</p> <p>4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves -- greater reserves for IFR terminal weather -- and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.</p>	
G0017-31	<p>Thank you for the opportunity to offer comment on the Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska. The FNSB looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army. The FNSB point of contact for this action is Jeff Jacobson, Chief of Staff, jjacobson@fnsb.us 907-459-1300.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0018-1	<p>Thank you for the opportunity to comment on the Joint Pacific Alaska Range Complex (JPARC) Modernization & Enhancement Draft Environmental Impact Statement (DEIS). The Alaska Department of Transportation and Public Facilities' (DOT&PF) mission is to Get Alaska Moving through service and infrastructure. We do this by providing for the safe and efficient movement of people and goods and delivery of state services. In this regard we will comment on safe access and the potential impact on aviation by the proposed actions. Other State of Alaska departments are providing comments on various aspects of the DEIS that fall within their purview. It is in this context that I provide comments to you on the JPARC DEIS.</p> <p>Alaska and the military have a long and mutually beneficial history, and the State of Alaska wants to preserve and expand our relationship wherever possible. Alaska's unique and spacious environment already provides superb military training opportunities and we support and endorse modernization and enhancement of this unique capability to support the Department of Defense (DoD) for the next century. It is in Alaska's best</p>	<p>We appreciate the support the Alaska DOT&PF and others have given the military over the years and welcome your assistance in seeking those means that would accommodate the safe, compatible use of those Alaska resources required to serve both military and civilian needs. Both the Air Force and the Army will continue to work with government agencies and other stakeholders to pursue those EIS mitigation measures and other viable options required to meet those needs. The EIS acknowledges the significance of the general aviation sector in Alaska and the many concerns it has with potential impacts of the airspace proposals on high use areas such as the Isabel Pass. Flight safety is of utmost importance to the military and both the Air Force and the Army will consider all means possible, including those recommendations noted in your comments, for ensuring a safe operating environment for all concerned. This includes seeking the funding necessary to expand and enhance communications capabilities within those areas where this coverage may be lacking. As airspace needs for Unmanned Aerial Vehicle operations continue to be explored by the FAA, DoD, and other interests, the Army and Air Force will seek viable and feasible solutions to support the test and</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>interest to seek creative methods to share the combination of air, ground, and sea resources that provide a realistic training environment for the military. While we desire to be both a gracious host and a partner with the military in Alaska, we have concerns about some of the proposed actions in the JPARC DEIS that must be addressed in the National Environmental Policy Act (NEPA) process.</p> <p>Importance of Aviation in Alaska</p> <p>We like to say that in Alaska, the general-aviation small aircraft is the equivalent to the mini-van for people living in the contiguous 48 states. There are over 10,000 aircraft in Alaska and over six times as many pilots per capita when compared to the rest of the U.S.A. Furthermore aviation is a major economic force by contributing more than \$3.5 billion annually to our economy, or about 8% of gross state product. Aviation is the fifth largest employment sector in Alaska, with over 47,000 aviation related jobs. Perhaps most importantly, aviation is the essential means of access to rural Alaska because of our expansive geography.</p> <p>Safe Access</p> <p>Providing for the safe transportation of the flying public in Alaska is a very important part of the State's responsibility. We want to help create a culture of safe travel in Alaska. The number of aircraft mid-air collisions is disturbingly high, which we want to eliminate or at least reduce the potential causes of whenever possible.</p> <p>We believe it would be beneficial for the DoD to articulate and explain the on-board sensing capability possessed by military aircraft, as well as help Alaska stakeholders understand the relative frequency of military operations below 5,000 agl. These explanations should go a long way towards addressing concerns of Alaska general aviation and commercial operators.</p> <p>These explanations are especially important due to the need for access to the southern Alaska Range, Denali Highway, and Talkeetna Mountains. Furthermore Isabel Pass is a major VFR "highway in the sky" that connects the northern half with the south central and southeastern portions of Alaska. The proposal to establish restricted air space over the Battle Area Complex (BAX) southeast of Delta Junction is of notable concern to state stakeholders</p>	<p>training needs in Alaska without adversely affecting other airspace uses. The military also wants to build upon their history and successes in Alaska and will work closely with all concerned in seeking those cooperative solutions that will help us achieve our mutual needs while not jeopardizing the safe, beneficial use of Alaska's air, ground, and sea resources.</p>

Table N-5. Government Response to Comments (*continued*)

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	<p>as well. The concept of “turn on/turn off” airspace has been articulated by the DoD in past discussion. How might this concept apply to the BAX restricted airspace?</p> <p>Enhance Communications for Safety</p> <p>DoD created the Special Use Airspace Information Service (SUAIS) in the mid-1990’s to address deconfliction of air space use. SUAIS greatly reduced the potential for mid-air collisions between civil and military aircraft. While both civil and military organizations generally agree upon the value SUAIS provides for deconflicting aircraft, to date aviation organizations continue to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p> <p>Any expansion of MOA airspace should have accompanying radio coverage, staffing, and other elements of the SUAIS infrastructure to allow civil pilots to communicate with US Air Force Range Control during times the MOAs are active. It is also important that the audio recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex.</p> <p>Unmanned Aerial Vehicles</p> <p>We provided comments for the scoping phase of the JPARC EIS regarding Unmanned Aerial Vehicles (UAVs), and want to reiterate our concerns. UAVs clearly represent an important and growing technology for the military and other agencies. We think now is the time to address how UAVs might be employed in a training environment while simultaneously ensuring safe separation from traditional aircraft. We believe an Alaska-as-prototype methodology is possible in meeting the challenge if all stakeholders work together to achieve the best approach. We look forward to participating with Department of Defense (DoD) planners in this area. The University of Alaska is working to secure a UAV training area under the auspices of the FAA. Perhaps DoD and the University of Alaska could work together to improve UAV safety.</p> <p>Conclusion</p>	

Table N-5. Government Response to Comments (*continued*)

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	<p>Alaska has a long, productive and collaborative history with the U.S. military. We want to build upon our history and continue to provide the remarkable environment for realistic military training opportunities so that our military can continue to be the best trained forces in the world. It is in both Alaska's and DoD's best interests to seek cooperative solutions to be able to share the unique combination of air, ground, and sea resources found in Alaska in a safe and mutually beneficial way.</p> <p>The State of Alaska wants to continue to be both a gracious host and a full partner with the DoD in Alaska; however we have concerns and needs that must be addressed in the EIS and Record of Decision. I believe we can meet both the military's need for realistic training while ensuring that Alaskans continue to have reliably safe access to the areas within the proposed expanded MOAs.</p>	
G0018-2	<p>Importance of Aviation in Alaska</p> <p>We like to say that in Alaska, the general-aviation small aircraft is the equivalent to the mini-van for people living in the contiguous 48 states. There are over 10,000 aircraft in Alaska and over six times as many pilots per capita when compared to the rest of the U.S.A. Furthermore aviation is a major economic force by contributing more than \$3.5 billion annually to our economy, or about 8% of gross state product. Aviation is the fifth largest employment sector in Alaska, with over 47,000 aviation related jobs. Perhaps most importantly, aviation is the essential means of access to rural Alaska because of our expansive geography</p>	<p>The importance of aviation in Alaska and the contribution general aviation makes toward the economy of Alaska is discussed in Section B.12.3.3, Key Industries in the EIS Study Area. The Air Force would continue to coordinate with the FAA and other regulatory agencies to address stakeholder concerns further and develop mitigations to minimize any potential impacts.</p>
G0019-1	<p>July 06, 2012</p> <p>ALCOM Public Affairs 9480 Pease Avenue, Suite 120 Joint Base Elmendorf-Richardson, Alaska 99506</p> <p>Re: Joint Pacific Alaska Range Complex Modernization and Enhancement Draft Environmental Impact Statement Comments of City of Delta Junction, Alaska Our File No. 11025.020</p> <p>Gentlemen:</p> <p>We are city attorneys for the City of Delta Junction, Alaska. We submit these</p>	<p>Thank you for your comments on the JPARC Draft EIS. Your comments are duly noted.</p> <p>The proponent consulted with Delta Junction as a local government, specifically the Mayor of Delta Junction, Mary Leith-Dowling. Also, Air Force and Army leadership met with Delta Junction community leaders during both public scoping meetings (see Table A-2 in Volume 2 of the Final EIS) and public hearing meetings. During scoping, the following attendees joined Air Force and Army leadership at the Delta Junction City Hall: Delta Junction Mayor Mary Leith-Dowling, Delta Junction City Administrator Mike Tvenge, and Delta Junction Mayor Pro Tem Pete Hallgren. During public hearings, Air Force and Army leadership met with Delta Junction City</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>comments to the Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska ("JPARC DEIS"). The comments submitted here are in addition to the City's claims for breach of the Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"). Neither these comments nor the City's participation in the JPARC DEIS process is a waiver by the City of those breaches.</p> <p>The City believes that the context for its comments is critical and will provide background. The U.S. Army has admitted that changes in staffing at the U.S. Army have cost the Army its historical context.</p> <p>I. BACKGROUND</p> <p>The City of Delta Junction ("Delta") is a general law city located immediately to the north of the Donnelly Training Area East and Ft. Greely. The surrounding area along the Richardson Highway and the Alaska Highway, outside of Delta, is home to several thousand additional citizens ("Deltana").</p> <p>Beginning in 2001, United States Army Alaska ("USARAK") sought to develop two training facilities in the Eddy Drop Zone of the Donnelly Training Area East, the Combined Arms Collective Training Facility ("CACTF") and the Battle Area Complex ("BAX"). The proposed location for the CACTF and BAX was immediately adjoining the southern city limits of Delta and a considerable stretch of Deltana along the Alaska Highway. Through a series of disputes in the context of the National Environmental Policy Act, Delta objected to and resisted the location of the CACTF and BAX so close to populated areas. Some of the history of those objections and the background to their resolution are described in Delta Ordinance 2006-06 ("the 2006 Ordinance"), attached as Exhibit A, and Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"), attached as Exhibit B. More detailed discussion and analyses can be found in the City's comments to the various environmental impact documents, the pleadings filed in federal court and the working papers leading to the 2006 Agreement.</p> <p>The City argued strongly for an alternate location for the CACTF and BAX, at the south end of the Donnelly Drop Zone, described as "Alternative 3" in</p>	<p>Administrator Mike Tvenge.</p> <p>A detailed summary of the scoping process, the public involvement process, and agency coordination is contained in Appendix A, Public Scoping Summary.</p> <p>On page 3-206, the Draft EIS mentions the Memorandum of Agreement between USARAK and the City of Delta Junction. However, additional language will be added to the Final EIS. The paragraph in the Final EIS will read:</p> <p>"Delta Junction, directly north of Fort Greely at the junction of the Richardson and Alaska Highways, does not have a comprehensive plan for land use but has established municipal ordinances governing land use and subdivision layout and approvals. The City Planning Commission serves as both an advisory body (prepares plans) and enforcing body of city ordinances. The Commission approves all plat plans, variances, and conditional use requests. The "keyhole" area is essentially undeveloped and wooded, with one or two existing residences. There is an existing Memorandum of Agreement (USARAK-MOA-029), signed 16 May 2006, between USARAK and the City of Delta Junction. The agreement lays out specific operational actions and restrictions that apply to the use and management of the existing BAX and CACTF in DTA-East (USARAK 2006-3). Mitigations as outlined in the BAX and CACTF Final EIS (dated June 2006) and ROD (signed 19 July 2006) remain in effect and will not be superseded unless a better practice, enhanced, stringent mitigation is implemented as part of this EIS."</p> <p>Section 3.2.3.1 discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should construction be needed in the future, the Army will conduct necessary environmental analyses. The BAX proposal does not have a hydrologic impact, since this action affects only airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC</p>

Table N-5. Government Response to Comments (*continued*)

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	<p>the Supplemental Draft Environmental Impact Statement for the Construction and the operation of a Battle Area Complex and a Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska dated March 2006 ("the 2006 SDEIS").(1) USARAK objected to Alternative 3 because of added costs of construction, as detailed in the 2006 SDEIS. USARAK insisted on Alternative 2 in the 2006 SDEIS, the "preferred alternative," which adjoins Delta and Deltana.(2)</p> <p>An agreement was reached: Delta would withdraw its objections to Alternative 2 in exchange for commitments from USARAK for public safety, and USARAK's agreement that use of the CACTF and BAX would not be further expanded without the consent of Delta. The agreement was reduced to the writing attached as Exhibit B, and approved by the City under Ordinance 2006-06, attached as Exhibit A.</p> <p>Note that to interpret the 2006 Agreement you must have at hand both Exhibit A to the 2006 Agreement and the 2006 SDEIS itself, which both the 2006 Agreement and Exhibit A to the 2006 Agreement reference.</p> <p>-----</p> <p>1. 2006 SDEIS, Vol. 2, Figure 2.f. 2. 2006 SDEIS, Vol. 2, Figure 2.e.</p> <p>-----</p> <p>Much of the activity described in the JPARC DEIS is removed from the Delta and Deltana area, although the JPARC DEIS is vague about many of the impacts. However, many parts of the JPARC DEIS are specific to the Donnelly Training Area and to the BACX and CACTF in particular. Generally, Delta's comments to the JPARC DEIS go to the environmental impacts on the Donnelly Training Area East. To the extent that other aspects of the JPARC Modernization and Enhancement carry the potential to impact Delta and Deltana, those comments are intended to extent to those changes as well.</p> <p>II. COMMENTS</p>	<p>DA PAM 350-38). These are based on estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern during development of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p> <p>USARAK Regulation 95-1 and Army SOPs stipulate those safety practices aircrews must follow when planning and conducting flight missions. They include altitude restrictions for avoiding noise-sensitive areas, populated areas, livestock, dwellings, and other sensitive areas.</p> <p>Time-averaged and peak noise levels reflecting baseline munitions training do not exceed 62 dB CDNL and 115 dB PK 15(met), respectively, in areas outside of range boundaries. Flying operations are not conducted at a frequency sufficient to result in time-averaged noise levels exceeding 65 dB DNL.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>A. Comments Related to Memorandum of Agreement USARAK-MOA-029.</p> <p>It is very frustrating to Delta to have to discuss and review all of these issues again.</p> <p>1. The JPARC DEIS Is Defective Because JPARC Failed to Consult with Delta As a Local Government Impacted by the Proposed Activity.</p> <p>As the JPARC DEIS acknowledges, consultation with local governments impacted or potentially impacted by the proposed activities is mandatory.(3) That simply did not happen. Indeed, Delta did not even make the distribution list for local agencies impacted.(4) Given the troubled history of range expansion between USARAK and Delta, the omission is inexcusable. Delta and Deltana are the areas most likely to be impacted by increased activities in the Donnelly Training Area. The failure to contact and consult with Delta is an astonishing oversight.</p> <p>Delta has litigated the adequacy of NEPA documents with USARAK. Delta has vigorously participated in NEPA proceedings on the 2001 Environmental Assessment for the CACTF and BAX, forcing USARAK to a full environmental impact statement process. Delta's comments to the Draft Environmental Impact Statement for the CACTF and BAX contributed to USARAK's decision to issue a Supplemental EIS. Delta, without question, is the municipality with the most at stake in any expansion of activities in the Donnelly Training Range.</p> <p>The failure to consult with a major stakeholder, with a record of active participation in prior range expansions, makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>-----</p> <p>3. JPARC DEIS, Vol. 1, p. 1-33. 4. JPARC DEIS, Vol. 2, p. A-45.</p> <p>-----</p> <p>2. The JPARC DEIS Is Defective Because JPARC Failed to Discuss the 2006 Agreement.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>At no point in the JPARC DEIS that we can find does JPARC even mention the specific terms of the 2006 Agreement.(5) The omission is astonishing, because city council member Pete Hallgren handed a copy of the 2006 Agreement to JPARC at a scoping meeting. JPARC had actual notice of the existence of the 2006 Agreement, quite apart from USARAK being a party to it.</p> <p>Yet JPARC failed to acknowledge the consequences of the 2006 Agreement, let alone discuss the impact of the commitments made in that agreement to Delta and Deltana. Because of that omission, substantial portions of the discussion of proposed changes to the BAX in the JPARC DEIS ignore the contractual commitments made in the 2006 Agreement.(6) Among other issues, the proposed level of increased activities ignores the restrictions on training under specific weather conditions because of fire hazards, ignores known flood plain risks and ignores restrictions and limitations on noise and training activities.</p> <p>This omission is separate from the breaches of the 2006 Agreement. The 2006 Agreement is a part of the scope of the proposed range enhancements. It is an issue to be addressed as a part of any environmental impact statement. The omission of the 2006 Agreement from the JPARC DEIS makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>-----</p> <p>5. The JPARC DEIS briefly acknowledges the existence of the 2006 Agreement; JPARC DEIS p. 3-206, lines 31-33. The reference cites to the wrong USARAK number. Nowhere in the hundreds of pages of the JPARC DEIS are the terms of the 2006 Agreement discussed, or analyzed in relation to the JPARC DEIS.</p> <p>6. JPARC DEIS, Vol. 1, 3-178 to 220</p> <p>-----</p> <p>B. Comments Relating to Fire Danger.</p> <p>As Delta demonstrated in the negotiations and litigation over the BAX and</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>CACTF Ranges, the risks associated with wildfire are a critical concern. Very strong winds gust through the Black Rapids Canyon, Deltana and Delta routinely. Hot, dry conditions can extend for weeks at a time. A wildfire in those conditions is uncontrollable. Delta experienced just such a wildfire in 1999, when a wind-driven fire originating in the Donnelly Training Area East burned buildings on Ft. Greely and blew hot cinders several miles downwind. Uncontrollable wildfire originating from training activities is a critical concern.</p> <p>The presence of unexploded ordinance in portions of Donnelly Training Area East exacerbates the dangers from wildfire in training areas. Where a danger of unexploded ordinance is present, ground crews cannot be used to attempt to control the wildfire. Only aerial systems (air drops of water and fire retardant) can be used. Thus, efforts to control wildfire may be further hampered.</p> <p>The importance of those concerns is reflected in the 2006 Agreement. Substantial portions of that agreement address mitigating the risk of wildfire and providing for immediate, on-site control if a fire is started. The mitigation and control requirements demonstrate the significance both USARAK and Delta attach to this risk.(7)</p> <p>Note that under extreme fire conditions, no training would occur at the BAX except for troops scheduled for immediate deployment and then only after prior consultation with Delta.(8) For lower levels of fire conditions, specific levels of staffing and staffing locations are provided.</p> <p>By contrast, the discussion of fire danger associated with the proposed JPARC Range Enhancement is incomplete and inadequate. The only consideration given to wildfire is fires ignited by munitions and incendiaries, and even that inadequate discussion is cast as nearly meaningless generalities.(9) Wildfires can also be ignited by careless smoking, exhaust manifolds on vehicles, escaped campfires and many other sources. The failure to address other man-made causes of wildfire makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>-----</p> <p>7. See 2006 Agreement, pp. 3.4.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>8. Ibid, p. 3. 9. See, e.g., JPARC DEIS 3-118 to 119.</p> <p>-----</p> <p>The proposal to increase training activities from 106 days annually to 238 days annually(10) is effectively an impossibility without violating the 2006 Agreement or greatly increasing training activities during the harsh Interior Alaska winter. A 225% increase is not feasible.</p> <p>Because wildfire is uncontrollable in high and extreme weather conditions, and because those kinds of weather conditions prevail in the Donnelly Training Area for days and sometimes weeks at a time, the goals of the BAX Range Expansion cannot be met without extremely high jeopardy of wildfire. The failure of the JPARC DEIS to address these environmental realities makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Delta notes that the solution to the wildfire risk is not to offer more staffing or more equipment, or even more removal of vegetation. Under high and extreme fire conditions, wildfire is uncontrollable. The only means of "controlling" wildfire risk in high and extreme conditions is to sharply curtail human activity in the Donnelly Training Area. That single solution is contradicted by the overly ambitious training days goal described in the JPARC DEIS. The failure by the JPARC DEIS to directly address that contradiction makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>C. Comments Relating to Flooding.</p> <p>As Delta demonstrated from historical records and from the work of an independent hydrologist, the area where USARAK chose to locate the BAX and CACTF are prone to sheet flooding and aufeis-generated seasonal flooding. Those risks were addressed in the 2006 Agreement and Exhibit A to the Memorandum.(11)</p> <p>"Sheet flooding" is an unusual condition that occurs in the Donnelly Training Area East in which instead of channelized flow, water flows over the entire area. Man-made structures disrupt and channelize that sheet flow, creating</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>very serious downstream risks. Delta, and the Deltana region, are downstream.</p> <p>-----</p> <p>10. JPARC DEIS, p. 6. 11. 2006 Agreement, p. 4; Exhibit A, pp. 2-3.</p> <p>-----</p> <p>"Aufeis-generated seasonal flooding" occurs in the Jarvis Creek channel, which flows south to north through the Donnelly Training Area East. The risk is mentioned but not assessed in the JPARC DEIS.(12) In the Executive Summary, the JPARC DEIS ultimately concluded that the BAX will have no adverse impact on the flood plain.(13) That unsupported claim stands in sharp contrast to events on the ground. In the spring of 2006, an aufeis event occurred on Army land, that caused a massive diversion of spring runoff from Jarvis Creek, overland through the BAX site and then more than 10 miles through the Delta and Deltana area north to ultimately discharge into the Tanana River. This rapidly rising floodwater ran down the street in front of the Delta High School as volunteer crews using heavy equipment dug emergency ditching to keep the water from flowing into residential neighborhoods and downtown Delta, while miles to the north State of Alaska Department of Transportation deliberately breached Tanana Loop Extension road in several places to allow the floodwater to more quickly drain into the Tanana River. A number of residents were stranded for several days in their homes due to this action. Anything that alters the topography in Donnelly Training Area East, including the range expansions contemplated by the JPARC DEIS, carries the risk of worsening the risk of aufeis-generated flooding, disruption of the sheet flow flooding or both.</p> <p>USARAK acknowledged these risks and partially addressed them in the 2006 Agreement.(14) The unspecified enhancements to the BAX contemplated by the JPARC DEIS involve a careful assessment of what changes will be made to the Jarvis Creek channel, the alternate flood channel and the areas prone to sheet flooding. The failure of the JPARC DEIS to meaningfully discuss these risks makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>In the case of both sheet flow and aufeis-generated flooding, it is important that vegetation remain in place to slow and impound the velocity of the water. Delta notes that this important requirement is inconsistent with removal of that vegetation to manage the risk of wildfire. The failure of the JPARC DEIS to address this inconsistency makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Because the area in which the BAX is located is in a known flood plain, Executive Order 11988 bars construction unless there is no practicable alternative.</p> <p>-----</p> <p>12. JPARC DEIS, §3.3.6.1 at p. 3-195. 13. JPARC DEIS, Vol. 1, p. 12, Table ES-1. 14. 2006 Agreement, p. 4.</p> <p>-----</p> <p>A word search of the JPARC DEIS demonstrates that Executive Order 11988 is never mentioned in the discussion of the BAX, and only briefly acknowledged to exist in Volume 2 of the JPARC DEIS.(15) There is no discussion of the relationship of Executive Order 11988 to the proposed BAX range expansions. The failure by the JPARC DEIS to meaningfully discuss the risks of construction in a floodplain and the impact of EO 11988 makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Aufeis occurs throughout the flatter areas in Donnelly Training Area East. As Delta has demonstrated previously, any structures that impede the flow of water, even relatively small amounts of water, create potential for aufeis formation during the winter. Over the course of the long Alaska winter, that aufeis can thicken into layers many feet thick. That aufeis not only jeopardizes whatever structures may have been created; it also impacts the flow of water during spring runoff in unpredictable ways.</p> <p>The JPARC DEIS baldly claims that the BAX range expansions will have no adverse impact on water resources or flood plains.(16) The assertion is simply wrong. These cumulative risks identified by Delta as far back as 2005</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>demonstrate that there are very serious hydrologic risks. These are risks, which USARAK acknowledged to exist in the 2006 Agreement. For the JPARC DEIS to claim otherwise now makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>D. Comments Relating to Public Safety.</p> <p>The Donnelly Training Area East directly abuts the southern boundary of Delta and, along the Richardson and Alaska Highways, the Deltana region. Delta and Deltana will bear significantly increased safety risks from the proposed range enhancements. The risks go beyond the wildfire and flood risks described earlier in this letter. The increased overflights, increased air-to-ground and ground-to-air weapon activity, increased unmanned aerial vehicle activity and increased night training all pose safety risks for Delta and Deltana.</p> <p>-----</p> <p>15. JPARC DEIS, Vol. 2, p. B-48. This omission is particularly frustrating to Delta. In 2005-2006, in the discussions regarding the adequacy of the Supplemental Draft Environmental Impact Statements, it was Delta that had to point out the existence of Executive Order 11988 to USARAK. It is frustrating, even alarming, that JPARC has apparently already forgotten its existence.</p> <p>16. JPARC DEIS, §3.3.6 at p. 3-195.</p> <p>-----</p> <p>Yet Delta was not meaningfully consulted. And to the extent that Delta participated in the scoping meetings, by providing a copy of the 2006 Agreement, for example, it was simply ignored. The failure by the task force charged with drafting the JPARC DEIS to even consult with Delta makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>The JPARC DEIS acknowledges that existing activities generate munitions-related rubble in the BAX.(17) Munitions-related rubble contains hazardous materials. The JPARC DEIS concludes that there will be no increased adverse impact. Delta is at a loss to understand how a proposed 225% increase in training activities can fail to substantially increase the amount of</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>munitions-related rubble. That rubble, apparently, is stored on the Donnelly Training Area, at or near the BAX. As such, it presents a risk to Delta in the event of a flood event, to give just one example. Unless JPARC can show that Delta's assumptions are in error, the failure by the JPARC DEIS to address this issue makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Finally, it is deeply troubling to Delta that JPARC is using the location of the CACTF and the BAX as a basis for increased air activity over inhabited areas. As described earlier in this letter, the basis for Delta's entry into the 2006 Agreement was the agreement that in exchange for acquiescing in the BAX and the CACTF being at the north end of the Donnelly Training Area East, as opposed to the south end favored by the City, the use of those ranges would not be expanded without the agreement of Delta. The failure by the JPARC DEIS to meaningfully discuss the breach of that bargain and the increased risk to Delta and Deltana makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>E. Comments Relating to Noise.</p> <p>The importance of noise and noise management is evident in the 2006 Agreement: the agreement was predicated on a demonstration of the noise from a 105mm Stryker Mobile Gun System immediately prior to the public hearing on the ordinance to adopt the 2006 Agreement. Additionally, the JPARC DEIS concluded that there is a potential adverse impact</p> <p>As Delta understands the JPARC DEIS, the BAX range expansion contemplates a 225% increase in training days, greatly increased amounts of fixed and rotary wing air traffic, some of it jet traffic, immediately above and along the southerly boundary of Delta.</p> <p>-----</p> <p>17. JPARC DEIS, §3.3.7 at pp. 3-196 to 3-197.</p> <p>-----</p> <p>The hours during which the activity would occur are greatly increased. Night</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>training would be added, creating noise issues into the evening.</p> <p>This would not be as great an issue if USARAK had agreed to locate the BAX and CACTF at the south end of Donnelly Training Range East. But USARAK insisted on the very northern end, abutting the City limits, and promised noise would not be an issue. Now, apparently, residents of Delta and Deltana can expect helicopter traffic 500 feet overhead at 10 PM two-thirds or more of the year.</p> <p>The JPARC DEIS admits that the EPA has determined noise levels above 55 dB are annoying to adjoining property owners.(18) Further, the JPARC DEIS recognizes that the noise from the BAX will potentially have an adverse impact on the environment surrounding it.(19) But the JPARC DEIS goes on to assert, without citation to authority, that levels of 65 dB are permissible, even though it means that 12% or more of the population will be highly annoyed.(20) The activities described in the JPARC DEIS also represent a substantial increase in noise levels for residents of Delta and Deltana. Under the 2006 Agreement, Delta agreed to tolerate noise below 65 dB.21 Now Delta residents are being told to expect noise "that would not be expected to exceed 65 dB."(22) Delta knows from experience that changes in phrasing like this are a wedge to much higher activity levels. The proposed increase in tolerated levels of noise is a breach of the 2006 Agreement. No justification is offered for this breach of the 2006 Agreement. The failure by the JPARC DEIS to address the unilateral increase in noise levels and noise duration makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>F. Relationship Between City of Delta Junction and U.S. Army.</p> <p>Delta prides itself on a long, mutually cordial and mutually beneficial relationship with the U.S. Army. Many Delta and Deltana residents are veterans, most of whom were stationed at Ft. Greely during their military careers. Delta values that relationship and does not want to unnecessarily damage it.</p> <p>-----</p> <p>18. JPARC DEIS, Vol. 2, pp. E-14 to E-15. 19. JPARC DEIS, Vol. 1, p. 12, Table ES-1.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>20. JPARC DEIS, Vol. 2, pp. E-14 to E-15.</p> <p>21. 2006 Agreement, Exhibit A, pp. 5-6.</p> <p>22. JPARC DEIS, Vol. 11 pp. 3-187 to 3-188.</p> <p>Delta is also mindful of the risk that Eielson Air Force Base may be reduced in size, or even realigned, and understands the importance of adequate training facilities and conditions to the continued operation of the Base.</p> <p>-----</p> <p>Finally, Delta is mindful of the importance of adequate training to our troops, for their safety and security, and to allow them to perform the missions that may be assigned to them.</p> <p>Delta took those considerations in mind when it made the settlement described in the 2006 Agreement. Some of the factors that led to Delta's agreement in 2006 were the very considerations described above.</p> <p>Now, however, in the face of the U.S. Army's apparent abandonment of the 2006 Agreement, it is difficult for Delta to once again make concessions that jeopardize its safety and values. It is deeply troubling that, despite having a copy of the 2006 Agreement provided at the scoping meeting, JPARC chose to completely ignore its existence and the contractual obligations made by USARAK under that agreement. From the point of view of Delta, the U.S. Army has breached and proposes to further breach its agreement with the City.(23)</p> <p>G. Conclusion.</p> <p>In light of these circumstances, a further issue that the JPARC DEIS should address is how a level of trust and confidence between the U.S Army and Delta may be restored. Delta would strongly prefer to resolve these issues by compromise and agreement, but is understandably concerned that USARAK, JPARC and the U.S. Army will not abide by whatever agreement might be made. The City of Delta Junction invites the U.S. Air Force and the U.S. Army to suggest ways in which some settlement can be made.</p> <p>As drafted, Delta believes the DEIS is inadequate as a matter of law. A</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Supplemental Environmental Impact Statement, with further notice and comment periods, is very likely required. Separately, the City and Delta Junction must resolve the very serious breaches of the 2006 Agreement.</p> <p>-----</p> <p>23. At the public hearing in Delta Junction, the military suggested that because the JPARC DEIS is a joint effort of the Air Force and Army, the 2006 Agreement might not apply. The claim is wrong as a matter of law. Donnelly Training Area East was USARAK land at the date of the 2006 Agreement. Whatever rights the Air Force may have can only derive from those the Army has. Those rights are limited by the 2006 Agreement.</p> <p>-----</p> <p>Otherwise, the important objectives of the JPARC DEIS will be delayed, at least as to the BAX modifications, while the NEPA requirements are satisfied, and, at least potentially, an action for breach of the 2006 Agreement ensues. Delta strongly urges meeting to resolve these issues without another five year cycle of environmental and contract litigation.</p> <p>Sincerely yours.</p> <p>GUESS & RUDD P.C. /James D. DeWitt/ James D. DeWitt</p> <p>cc: Mary Leith, Mayor City of Delta Junction</p> <p>Mike Tvenge, City Administrator City of Delta Junction</p> <p>Dennis Dunn, (via email only, [deleted for privacy]) USARAK G3, TSS Chief</p>	
G0020-1	<p>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 Paxon MOAs because it moves the proposed southern boundary of “Alternative A” 20</p>	<p>Alternative E was created in response to public comments, in order to avoid impacts to the Lake Louise area. This comment is duly noted.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	nautical miles to the north.	
G0020-2	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.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0020-3	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.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0020-4	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.	The concerns expressed in the Matanuska-Susitna Borough Resolution Serial No. 12076 and by others over lower altitudes of the proposed Fox 3 and Paxson MOAs are addressed in the FEIS. The potential impacts these lower altitude operations may have on wildlife, nonparticipating air traffic, recreation, hunting and other interests were considered in the mitigations and other viable options that will be pursued with stakeholders and other interests to find those solutions that will best serve everyone's needs.
G0020-5	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.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0020-6	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.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The limitation on supersonic operations noted in this comment is the current restriction for the Fox 3 MOA and would apply to the expanded MOA.</p>
G0020-7	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.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will complete consultations with the USFWS and ADF&G prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and ROD to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>
G0020-8	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, 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.	<p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p> <p>The Air Force will consult with the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		(2008) and include seasonal avoidance of waterfowl concentration areas.
G0020-9	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	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0020-10	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 halfmile 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.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0020-11	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	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	flight corridors, restricted or closure areas, and dates of training use.	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will update published charts and maps to identify the new airspace and operational restrictions.</p>
G0020-12	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 Fox3 and Paxson MOAs prior to the issuance of any airspace.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p>
G0020-13	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.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.
G0020-14	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.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0020-15	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.	IFR flight through an active MOA in a non-radar environment is not currently feasible. On the other hand, the proposed Fox 3 and Paxson MOAs will only inhibit IFR traffic in the Paxson MOA during military flying exercises(MFEs). These exercises would only close the IFR airways for 2.5 hours twice a day for up to 60 days per year. MFEs are scheduled months in advance, so that any IFR flight could easily be planned around the military exercise times.
G0020-16	Good Afternoon: Attached to this email you will find a copy of Matanuska-Susitna Borough Resolution Serial No. 12-076, providing comment on the March 12, 2012, Joint Pacific Alaska Range Complex Environmental Impact statement. If you have any questions please let us know through the contact information provided below. Thank you. Brenda J. Henry Clerk's Office Matanuska-Susitna Borough 350 E. Dahlia Avenue Palmer, AK 99645 www.matsugov.us brenda.henry@matsugov.us 745-9684 direct line 745-9845 fax	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0020-17	WHEREAS, the United States Air Force and United States Army are proposing to modernize, enhance, and expand the Joint Pacific Alaska Range Complex, (JPARC); and WHEREAS, the Matanuska-Susitna Borough is supportive of the United States military presence in Alaska and recognizes its needs for training; and WHEREAS, much of the existing Fox 3 Military Operation Area (MOA) is situated within the external boundaries of the Matanuska-Susitna Borough; and WHEREAS, the United States Air Force and the United States Army are requesting public comment on its a draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska; and WHEREAS, the Matanuska-Susitna Borough is the fastest growing area in the state of Alaska; and WHEREAS, the Matanuska-Susitna Borough population is expected to double in the next 20 to 25 years; and WHEREAS, all the proposed alternatives, except the No Action Alternative, consist of increases in combat flight training exercises within airspace above the Matanuska-Susitna Borough; and WHEREAS, the	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>proposed Fox 3 MOA and Paxson MOA would expand the existing training airspace southerly, extending to much of the Talkeetna Mountains areas adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View; and WHEREAS, expansion of the existing Fox 3 MOA and Paxson MOA airspace easterly could encompass the community of Lake Louise and the adjacent areas of Lake Susitna, Lake Tyone, and Crosswind Lake; and WHEREAS, there are approximately 500 private property parcels and 80 year round residents in the greater Lake Louise area; and WHEREAS, the Lake Louise Community Non-Profit Corporation, that represents property owners and residents of the greater Lake Louise area has expressed its many concerns about noise impacts on the local economy, lifestyle, wildlife, recreational use, aviation, etc., by letter correspondence dated February 11, 2011, to the Borough Assembly, and June 2, 2012, to the Alaskan Command; and WHEREAS, the Talkeetna Community Council has expressed its concerns about civilian aviation safety and the undesired impacts of noise on the tourism industry and wildlife by letter correspondence dated June 4, 2012; and WHEREAS, many Matanuska-Susitna Borough residents and visitors depend upon the airspace within the proposed expanded airspace, as well as the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter /hiker guiding, operating lodges, operating mines, etc., and for various non-commercial, recreational, and subsistence activities, such as hunting, hiking, food gathering, sightseeing, etc.; and WHEREAS, there exists an abundance of wildlife resources within the area proposed for expansion; and WHEREAS, the proposed expansion of the Fox MOA airspace would cover the Nelchina caribou herd calving grounds, all of which is located within the boundaries of the Matanuska-Susitna Borough; and WHEREAS, the proposed lateral expansion of the current Fox 3 MOA would enlarge the military operating area within Borough boundaries by an estimated 5,500 square miles in Alternative “A” and by an estimated 3,500 square miles in Alternative “E;” and WHEREAS, the United States Air Force, in its August, 1995, “Final Environmental Impact Statement Alaska Military Operations Areas,” and Record of Decision that followed in April, 1997, diminished the Fox MOA by 910 square miles to its present location and dimension due to undesirable impacts of noise; and WHEREAS, the proposals will expand airspace vertically to include training areas between 500 feet Above Ground Level (AGL) and 18,000 feet above Mean Sea Level (MSL); and</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>WHEREAS, the United States Air Force, in its August, 1995, “Final Environmental Impact Statement Alaska Military Operations Areas,” and Record of Decision that followed in April, 1997, raised the proposed minimum flight altitude from 3,000 feet AGL to 5,000 feet AGL due to undesirable noise impacts and in order to "preclude the potential for direct over flight of sensitive resources"; and WHEREAS, proposed lateral and vertical expansions of training airspace would increase the probability of conflict between civilian and military aircraft; and WHEREAS, the potential for near misses or midair collisions between military and civil aviation within the proposed Fox 3 and Paxson MOA, is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these 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.</p>	
G0021-1	<p>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.</p> <p>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</p>	<p>Thank you, Senator, for your comments. In accordance with the National Environmental Policy Act, the Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>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 .</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
G0022-1	<p>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:</p> <p>Brad Palach 333 Raspberry Rd Anchorage, AK 99516 Alaska Department of Fish and Game (907)267-2145</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0022-2	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.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0022-3	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.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0022-4	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.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-5	We recognize that minimum over flight of 5,000 ft above ground level (AGL) is proposed as mitigation for many areas with identified populations	The Air Force understands the potential effects use of those required lower mission altitudes could have on other aviation activities, to include important

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	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.	wildlife surveys. Those existing and proposed mitigation measures noted for this proposal in FEIS Appendix K along with other reasonable options would be pursued to the extent possible to help accommodate such flight activities. As discussed in the FEIS Sections 2.1.1 and 3.1.1, the lower Paxson MOA altitudes would only be used during those six annual, two-week timeframes major flying exercises are conducted. Air Force representatives are committed to working with your Department and other stakeholders through meetings and other means to help find those solutions that would best serve both military training and civilian aviation needs.
G0022-6	<p>To accommodate the Department's need for aerial survey work, we recommend the following mitigating measure:</p> <ul style="list-style-type: none"> • 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.) 	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-7	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	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	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."	and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. The Draft EIS identified mitigation measures for definitive projects under Biological Resources as: "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 and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."
G0022-8	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.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. The Air Force will consider appropriate follow-on studies, monitoring, and continued coordination to avoid disproportionate effects to subsistence opportunities.
G0022-9	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 allocated. For subsistence users, including those on low, fixed incomes, minor alterations in expenditures necessary to access alternate resources may	As stated in Section 3.8.13.1, "The proposed road alignments in TFTA would be entirely within the TFTA boundaries. TFTA is within a State nonsubsistence area and a Federal nonrural area, as depicted in Figure 3-22. USAG-FWA does allow access to these ranges for recreational use (described in Section 3.7.10); however, resources are not managed or prioritized for subsistence." Since the area is not managed or prioritized for subsistence, a change in public access for recreation would not result in subsistence users incurring expenditures from accessing alternate resources.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	be barriers to realistic participation.	
G0022-10	<p>Nelchina Caribou Herd and Moose Calving</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and ROD to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-11	<p>A similar situation exists for moose calving. During the moose calving period of May15 to July 15, a 5,000 ft AGL will be necessary across the entire Fox 3 and the Proposed Paxon MOAs.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>While it is possible to avoid well-established and mapped parturition areas for some species (e.g., caribou calving areas), moose don't tend to use established areas but calve in dispersed areas, so specific avoidance may not be possible for this species. Restrictions put in place for other resources (e.g., wild and scenic rivers) may also benefit moose.</p>
G0022-12	<p>Unlike caribou, moose do not have concentrated calving areas and spread out to calve, but are also susceptible to intense, low flying aircraft noise.</p>	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low level flights as</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		low as 500 ft AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies reviewed included some with moose. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights and sonic booms, on wildlife species.
G0022-13	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.	As noted previously, those FEIS mitigation measures noted for the Fox 3/Paxon MOA proposal would be pursued to the extent possible, along with other reasonable options, to help accommodate survey flight activities. Air Force representatives are committed to working with the Alaska Department of Fish and Game and other agencies through coordination meetings and other means to find those solutions that would best meet both military training and civilian aviation needs.
G0022-14	<p>We recommend the following mitigations to reduce stress on caribou and moose calves from low flying military aircraft during an important life stage.</p> <ul style="list-style-type: none"> • 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 <p>Delta Caribou Herd</p> <p>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.</p> <p>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 15).</p> <p>Talkeetna Dall Sheep</p> <p>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:</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • 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. <p>Delta Bison</p> <p>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.</p> <p>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.</p> <p>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</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	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.	
G0022-15	<p>Wildlife Mortalities</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Army manages natural resources within the spirit and letter of environmental laws, particularly the Sikes Act, which calls for preparation and implementation of installation-specific Integrated Natural Resources Management Plans (INRMPs). The U.S. Army Garrison - Fort Wainwright (USAG-FWA) Garrison Commander is responsible for compliance with laws in Alaska, including implementation and enforcement of the INRMP, which is periodically reviewed and updated.</p>
G0022-16	<p>Habitat Enhancement and Stream Crossings</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Prior to implementing any of the programmatic proposals considered in this EIS that could expand training (e.g., higher intensity levels of training, or broader types of training and expanded use of the training areas), proponents would undertake further evaluation and an appropriate level of NEPA</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>analysis, permitting, and agency coordination.</p> <p>The proponent will undertake all required consultation and will obtain necessary permits prior to undertaking any projects that would directly alter stream crossings or habitat enhancement areas. The U.S. Army Garrison - Fort Wainwright (USAG-FWA) Integrated Natural Resources Management Plan (INRMP) 2007-2011 Vol III contains many watershed management procedures.</p>
G0022-17	<p>Bears</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>It is standard practice for U.S. Army Garrison - Fort Wainwright (USAG-FWA) to protect wildlife species and Soldiers through soldier education on conflict avoidance measures. U.S. Army Alaska Range Regulation 350-2 (SD3.1) includes policing waste disposal on all training areas before, during, and after use.</p>
G0022-18	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.	One of the FEIS proposed Airspace Management mitigations is to pursue funding for enhancing use of the SUAIS and other communications capabilities within areas where this coverage may be lacking so as to keep the civilian aviation community informed on the scheduled and real-time MOA uses.
G0022-19	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.	<p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p> <p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.
G0022-20	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.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-21	<p>Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with ADFG prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-22	Page K-24, Subsistence. Biannual coordination meetings with the	The JPARC proponents have carefully considered a variety of alternatives

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.</p> <p>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 areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.</p>	<p>and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-23	<p>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,</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-24	<p>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:</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Brushkana Creek campground, • Tangle Lakes campground, • Paxson Lake campground, • Clearwater Wayside, • One Mile Creek/Wolverine Mountain, • Tangle Lakes trail, • Gulkana River Raft trail, • Castner Glacier trail, • Sourdough campground, • Lake Louise State Recreation Area, • MacLaren Summit Trail, • Glacier Lake/Sevenmile Lake/MacLaren River Trail System, • West Fork MacLaren River Trail, • Swede Lake trail, • Middle Fork Trail, • Round Top Trail, • Haggard Creek Trail, • Ewan Lake Trails, • Lake Louise/Crosswind Trail, • Tolsona Lake/Crosswind Trail, • Butte Lake Trail, • Coal Creek trail, • Moore's Camp Trail, • Top of the World Trail, • Chistochina River Trail, • Mankomen Lake Trail, • Indian River Trail, • Slana River Trail, • Nelchina Public Use Area Trail System, • Eureka/Little Nelchina Trails, 	<p>tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail, • Moore Lake/Gravling Lake/Marie Lake Trail. 	
G0022-25	<p>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:</p> <p>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.</p> <p>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</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Louise/Susitna.</p> <p>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.</p>	
G0022-26	<p>New Public Overflight Restriction Area</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0022-27	<p>Harvest of Wildlife for Subsistence and other uses</p> <p>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.</p> <p>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.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The discussion in Chapter 3.1.13.1, Impact Assessment Methodology, will be reviewed in accordance with the comment during the preparation of the Final EIS, as applicable.</p>
G0022-28	<p>Safety</p> <p>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</p>	<p>The public and private airfield listing in Appendix D was compiled from available information contained in aeronautical charts and other published sources. It is acknowledged that there are also many uncharted private airstrips in the affected region that could be affected by the airspace proposals. Again, the proposed mitigation measures and other options would be considered to minimize any impacts on those "off-field" areas used for survey flights and other such purposes. Funding would be pursued to</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>(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.</p> <p>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.</p>	<p>enhance communications capabilities for informing the public of the scheduled and real-time use of the existing and proposed training airspace. Scheduled RED FLAG-Alaska and other major flying exercises are publicized through various website and news media resources well in advance to keep all concerned informed of when these operations will occur.</p> <p>The Special Use Airspace Information Service (SUAIS) is a 24-hour service provided to civilian pilots. The SUAIS’s primary function is to provide civilian pilots with information regarding Air Force flight operations in the MOAs and Restricted Air space within central Alaska, so they may better plan their flights through and around the SUA. The service provides “near real time” information on Air Force flight activity in the Fairbanks and Delta Junction areas. SUAIS also provides information on Army artillery firing and known helicopter operations. Pilots can call SUAIS at 1-800-758-8723 or (372-6913 from the Fairbanks areas). If airborne, contact Eielson Range Control, VHF 125.3. SUAIS information can also be found on the Joint Base Elmendorf-Richardson home page at: http://www.jber.af.mil/11af/alaskaairspaceinfo then select “Special Use Airspace Information Service”. Beyond SUAIS radio range, Flight Service Stations can give status of special use airspace, to include Military Training Routes (MTR).</p> <p>The public and private airfield listing in Appendix D was compiled from available information contained in aeronautical charts and other published sources. It is acknowledged that there are also many uncharted private airstrips in the affected region that could be affected by the airspace proposals. Again, the proposed mitigation measures and other options would be considered to minimize any impacts on those “off-field” areas used for survey flights and other such purposes. Funding would be pursued to enhance communications capabilities for informing the public of the scheduled and real-time use of the existing and proposed training airspace. Scheduled RED FLAG-Alaska and other major flying exercises are publicized through various website and news media resources well in advance so that all concerned are informed of when these operations will occur.</p> <p>The Special Use Airspace Information Service (SUAIS) is a 24-hour service provided to civilian pilots. The SUAIS’s primary function is to provide civilian pilots with information regarding Air Force flight operations in the Military Operations Areas and restricted airspace within central Alaska, so</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>they may better plan their flights through and around the Special Use Airspace. The service provides “near real time” information on Air Force flight activity in the Fairbanks and Delta Junction areas. SUAIS also provides information on Army artillery firing and known helicopter operations. Pilots can call SUAIS at 1-800-758-8723 or (372-6913 from the Fairbanks areas). If airborne, contact Eielson Range Control, VHF 125.3. SUAIS information can also be found on the Joint Base Elmendorf-Richardson home page at http://www.jber.af.mil/11af/alaskaairspaceinfo (select “Special Use Airspace Information Service.” Beyond SUAIS radio range, Flight Service Stations can give status of special use airspace, to include Military Training Routes.</p> <p>The Notice to Airmen (NOTAM) system immediately disseminates time-critical aeronautical information that is either of a temporary nature or not sufficiently known in advance for publication on aeronautical charts or in other operational publications. NOTAM information is aeronautical information that could affect a pilot’s decision to make a flight. It includes details on airport or aerodrome primary runway closures, airspace, radar service availability, and other information essential to planned en route, terminal, or landing operations. It is every pilot’s responsibility to check the NOTAMs for pertinent information for that specific flight prior to departure.</p>
G0022-29	<p>Watana - Susitna hydroelectric Project</p> <p>The DE IS 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 at the lower 500 ft AGL floor. Close coordination with the Alaska Energy Authority and associated agencies and contractors will be crucial to maintaining safety.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>(SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0022-30	<p>Civilian Airspace Management</p> <p>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.</p> <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		compromising the quality of training and safety.
G0022-31	<p>Major Fighting Exercises (MFEs)</p> <p>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:</p> <p>Conduct no MFEs during May 15 to July 15, August 10 to September 30, October 21 to November 31, and December, and January</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-32	<p>Spelling</p> <p>We recommend a word search be performed to address spelling issues throughout the plan. For example Goodness River should be Goodnews River, and Paxson MOA should be Paxson MOA.</p>	<p>Thank you for your comment. A spelling and grammatical check will be made on the EIS before the Final version is released. "Goodness River" will be changed to "Goodnews River" as indicated. The Military Operating Area (MOA) is officially called the Paxson MOA, not to be confused with the census-designated place of Paxson, Alaska. A global check will be performed to ensure the two are not interchanged anywhere in the EIS.</p> <p>Paxon is the official name of the Air Traffic Control Assigned Airspace above the proposed MOA, so to avoid airspace name confusion, Paxson is the proposed name of the MOA.</p>
G0022-33	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).	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Final EIS will be revised in accordance with the comment.
G0022-34	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	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Final EIS will be revised in accordance with the comment.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>(“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):</p> <p>May 15 - June 10: Caribou parturition surveys*; moose twinning*, calf survival and periodic mortality surveys; occasional bear surveys.</p> <p>June 20-July 10: Caribou population estimate’ and composition surveys*</p> <p>Mid summer: Dall sheep surveys*</p> <p>October 1-10: Caribou composition survey*</p> <p>Following first adequate snow cover (~mid-October) and before Dec. 7: Moose population estimates*</p> <p>May 5-June 5: Ptarmigan surveys (aircraft access)</p> <p>Late March-Early April: Watana Su-Hydro winter range moose surveys* (scheduled for the next several years).</p> <p>Monitoring of moose and caribou movements via aerial radio-telemetry: Year-around.</p>	
G0022-35	<p>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.</p>	<p>The Air Force understands the potential effects the required lower mission altitudes could have on other aviation activities, to include important wildlife surveys. Those existing and proposed mitigation measures noted for this proposal in the FEIS Appendix K along with other reasonable options would be pursued to the extent possible to help accommodate such flight activities. As discussed in the FEIS Sections 2.1.1 and 3.1.1, the lower Paxon MOA altitudes would only be used during those six annual, two-week timeframes major flying exercises are conducted. Air Force representatives are committed to working with your Department and other stakeholders through meetings and other means to help find those solutions that would best serve both military training and civilian aviation needs.</p>
G0022-36	<p>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,</p>	<p>There are many concerns over how the lower altitudes and restrictions imposed by the JPARC airspace proposals may affect civil aviation operations within the affected regions. While the proposed mitigations and other options would be pursued to minimize these impacts, it is acknowledged that cooperative efforts would be needed to promote the safe,</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	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.	compatible use of this airspace by all concerned. The need to conduct wildlife survey and animal capture activities would certainly be a key factor in seeking those solutions. The FAA will be evaluating the different preferred airspace alternatives to determine if/how each can be implemented and managed without impacting air traffic flows and air traffic control system capabilities. Pending those study results, the Air Force and the Army would be working with all stakeholders through the Alaska Civil-Military Aviation Council and other forums to address these concerns.
G0022-37	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	The Air Force recognizes that there will potentially be economic impacts to aviation from the proposed action. Existing SUAIS communication systems have proven effective at maximizing access using real-time notifications and advisories. Upgrades and improved communication systems to pilots for a wider area could minimize potential impacts from delays or re-routing due to military schedules.
G0022-38	Page 3-84: Alternative E: Most of the comments above also apply to all action alternatives.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0022-39	Page 3-97: Line 38. Harvesting subsistence resources is not a certain event. Thus a delays result in lost opportunity.	Referenced sentence has been revised to note that delays in harvesting subsistence resources result in lost opportunity.
G0022-40	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.	<p>Date-specific mitigations or agreements are not always appropriate. For instance, the current aerial survey work done by Alaska Department of Fish and Game (ADFG) is a last-minute plan due to activity of the wildlife. The coordination with Air Force range controllers keeps the military advised of the survey aircraft locations on a real-time basis.</p> <p>Additionally, the Air Force is considering reconvening the Resource Protection Council (RPC) that was established for several years after the Alaska MOA EIS in the 1990s. The RPC would be the venue where mitigation efforts and their effectiveness and/or need for more analysis would be discussed. Flight deconfliction for aerial surveys could be accomplished at these periodic meetings.</p> <p>The Army has always accommodated ADFG and other agencies in the conduct of wildlife surveys. However, military training has priority and will not be disrupted for non-military purposes. The Army has a long-standing record of cooperation with aerial surveys for wildlife surveys and this will continue in the future.</p>
G0022-41	Page 3-97: Line 43: See comments above for page 3-82, lines 22-24 above	As noted for the previous comments, a cooperative effort would be needed

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		among all concerned to achieve the safe, compatible use of this airspace to include the Department's need to conduct wildlife survey and animal capture flight activities.
G0022-42	<p>Page 3-99 (Section 3.2.13.4 and elsewhere) Mitigations:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> o May 15 - June 10 o June 20 - July 10 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. <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • All alternatives: <p>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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0022-43	<p>Appendix I</p> <p>Page 1-2. 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.</p>	<p>The extraneous plans addressing areas outside the JPARC EIS area of effect have been removed from the Final EIS Appendix I.</p>
G0022-44	<p>Appendix K, Mitigation Measures</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Included in the Draft EIS mitigation measures for definitive projects under Biological Resources was the following: "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 and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>use, we request the following modifications to the first proposed mitigation measure shown on page K-19</p> <p>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:</p> <ul style="list-style-type: none"> • Crosswind Lake, and • Matanuska Valley Moose Range, • Denali Highway between Cantwell and Paxson. • Richardson Highway between Gulkana and Black Rapids, • Tok Cutoff (Glenn Highway) between Gakona and Mentasta. • The Gakona/Chistochina River drainages. • Upper Susitna River drainage (above Tyone R). • Brushkana River drainage. • Coal Creek drainage. • Watana Creek drainage. • Upper Nenana River/Wells Creek area. • Lake Louise/Susitna/Tyone Lake system. • Maclaren River drainage. • Tangle Lake system. • Hungry Hollow/Paxson/Summit/Fielding Lake areas. • Swede Lake drainage in Hungry Hollow down to the Alphabet Hills (bordered on the south by the W Fork Gulkana River), • Gillespie/June/Nita/Dick Lakes along the Richardson Highway south of Paxson, • Nelchina Public Use Area from the Glenn Highway near Eureka north to the Susitna River, <p>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</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>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:</p> <p>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.</p> <p>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.</p> <p>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.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>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:</p> <ul style="list-style-type: none"> • Brushkana Creek campground, • Tangle Lakes campground, • Paxson Lake campground, • Clearwater Wayside, • One Mile Creek/Wolverine Mountain, • Tangle Lakes trail, • Gulkana River Raft trail, • Castner 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, 	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Mankomen Lake Trail, • Indian River Trail, • Slana River Trail, • Nelchina Public Use Area Trail System, • Eureka/Little Nelchina Trails, • Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail, • Moore Lake/Gravling Lake/Marie Lake Trail. <p>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,</p> <p>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.</p> <p>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.</p> <p>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 areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.</p> <p>Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.</p> <p>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.</p> <p>Page K-25, Subsistence. We support these approaches, but request that the</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.</p> <p>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.</p> <p>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.</p>	
G0022-45	<p>Appendix G</p> <p>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,</p> <p>Protect 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 Julyune 15. Annually contact ADF&G to determine specific areas of avoidance.</p> <p>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:</p> <ul style="list-style-type: none"> • The mountains north and east of Chickaloon River, 	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>No changes are proposed for Fox 1 and 2, Birch and Eielson MOAs. Existing mitigations and flight avoidances for wildlife underlying these MOAs will continue. The Air Force will consult with ADFG prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas not covered under past mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • 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. <p>To encompass these concerns, we recommend the following mitigation measure be implemented:</p> <p>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 Fax 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.</p> <p>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.</p> <p>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.</p>	
G0022-46	<p>Page 1-43. 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.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	We request annual contact with the Department to ensure these locations have not shifted or need adjustment.	<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas not covered under past mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-47	Page 1-48. We question the need to include game management units outside the area of the plan. These include GMU 9, 16, 17, and 19.	<p>The EIS analyses focus on Game Management Units within the JPARC area of operations. Units that lie outside the footprint of military use airspace and DoD training areas are not evaluated as they would remain accessible and unaffected by changes in overflight.</p> <p>GMUs 9, 16, 17, and 19 partially lie underneath distant MOAs that were addressed in the 1997 Alaska MOA EIS, and fall within the footprint for changes proposed for Night Joint Training. The analyses in Section 3.5 of the EIS focus on the MOAs (and underlying lands) used during RED FLAG-Alaska exercises for which this capability is needed. This smaller area of operations does not overlap with these listed GMUs.</p>
G0022-48	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.	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your revised, corrected comment has been accepted and added to the record as an addendum to the comments submitted on July 9, 2012.</p>
G0022-49	<p>New Public Overflight Restriction Area</p> <p>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</p>	<p>The Air Force is considering configurations that both meet training needs and contain surface dangers zones within the boundaries of military land and existing restricted airspace to the extent possible. The north-south run-in headings for inert ordnance delivery is part of both Alternatives A and B,</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>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.</p> <p>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.</p>	<p>which both also include the primary requirement for live ordnance delivery.</p> <p>Current Department of Defense (DoD) policies prohibit developing new live ordnance impact areas; therefore, developing new live munitions impact areas is not an available option. Using the existing live impact areas on Donnelly Training Area (DTA) West, the Air Force is unable to accomplish all run-ins and delivery profiles required for this training capability and contain the surface danger zones within DTA-West.</p> <p>Under both alternatives, some portion of operations would require exclusive use of airspace and areas within surface danger zones that extend onto state land. The proponent will continue to work with the Alaska Department of Natural Resources (ADNR) to more accurately define the locations, frequency, and timing of live-fire training that would impact access and use of non-DoD land. The decision to select Alternative A or B will consider methods to minimize the effect of creating a large continuous block of restricted airspace that will cause access impacts on the public use and ADNR management of the underlying and surrounding areas. The Air Force would coordinate essential management tasks with ADNR annually to accommodate these as much as possible.</p>
G0022-50	<p>New Public Overflight Restriction Area</p> <p>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.</p> <p>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</p>	<p>This comment proposes a modification to the Alternative B for Realistic Live Ordnance Delivery that would require moving live ordnance targets such that the proposed activity could be contained within existing R-2202 boundaries. The cost and impacts of relocating live ordnance targets would more than likely exceed the impacts of an expanded restricted area that requires no changes to the land underneath it. Modifications/mitigations are being considered that would carve out access routes and/or restrict the times/days the proposed airspace could be activated.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	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.	
G0022-51	<p>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.</p> <p>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.</p>	See comment response G0013-3.
G0022-52	<p>Also related to subsistence and other uses,</p> <p>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:</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • 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. 	
G0024-1	<p>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</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0024-2	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Please do not hesitate to contact myself, or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0024-3	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.	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0024-4	We request further that the DOD consider the cumulative effects of the Susitna-Watana Project in the Final EIS.	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication,</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0024-5	<p>DESCRIPTION OF SUSITNA-WATANA PROJECT</p> <p>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</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Canyon. Transmission lines connecting into the existing Railbelt transmission system and an access road would also be constructed.</p> <p>Transportation Access</p> <p>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 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</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>sufficient for this type of construction.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • Speed restrictions will be imposed along appropriate segments; • Improvements will be made to the intersections including pavement markings and traffic signals. <p>Electric Transmission Facilities</p> <p>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:</p> <p>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 switch yard (together</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The switching and substations will occupy a total of approximately 16 ac.</p> <p>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.</p> <p>Access to the transmission line corridors will be:</p> <p>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.</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>b) By helicopter, where there is no access road projected.</p> <p>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.</p> <p>Dam and Reservoir</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Thick alluvial deposits will be removed from the river bed in order to found the dam on sound bedrock.</p> <p>Hydroelectric Facilities</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>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 800 MW. The exact sizing and number of units may change as a result of further transmission system studies.</p> <p>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.</p> <p>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.</p> <p>Ancillary Facilities</p> <p>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.</p> <p>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.</p> <p>Other site facilities include contractor work areas, site power, services, and communications. Site power and fiber optic cabling will be brought either on</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>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.</p> <p>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.</p> <p>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.</p>	
G0025-1	<p>1. Page 2-20, Line 21-23, Section 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.</p> <p>2. Page 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.</p> <p>3. Page 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.</p> <p>5. Page 1-1, Line 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.</p> <p>6. Page 1-32, Line 10, Section 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</p>	<p>Thank you for your comments on those issues and concerns that the Air Force and Army will both continue to discuss and resolve with the FAA as you review the Aeronautical Proposal for each preferred alternative. The FEIS preferred alternatives will act to alleviate some of the concerns expressed in your March 11, 2011 letter and ongoing discussions we have had with the FAA over the different JPARC airspace proposals. Many concerns were expressed by the public, government agencies, and other key stakeholders over these proposals that will also require further attention during the Aeronautical Study processes. As the FAA, DoD, and other interests continue to explore means for safely integrating UAV operations into the National Airspace System, we will be most interested in discussing those options the FAA will consider for supporting essential UAV training missions in Alaska. Be advised that the FEIS verbiage was modified where necessary to reflect the changes and corrections noted in the comment. The Army and Air Force look forward to continuing coordination with the FAA on how the JPARC airspace proposals can best be implemented to serve military, civilian, and FAA needs.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>aircraft and its efficient use.”</p> <p>8. Page 2-5, Line 20, Section 2.1.1.1: Other times by NOTAM is something that should be more clearly spelled out. Especially if this has the potential for being a daily event</p> <p>9. Page 2-6, Table 2-3: Add “ATCAA” to Paxton in the second section</p> <p>10. Page 2-6, Line 8, Section 2.1.1.1: Data is 4-6 years old now</p> <p>11. Page 3-32, Line 12, Section 3.1: Believe “no to” is a typo. The line does not make sense, please clarify.</p> <p>12. General comment: As per FAA comments given March 2011: The close proximity of the proposed Fox 3 & Paxon MOA remains a concern due to its close proximity to Anchorage Terminal Radar Approach Control’s airspace.</p> <p>13. Page 3-178, Line 1, Section 3.3: See comment 1 on the BAX</p> <p>15. Page 3-282, Line 1, Section 3.6, all: Currently is against FAA policy to establish or designate airspace solely for the use of UAV/UASs.</p>	
G0025-2	<p>4. Page ES-16, Lines 7 and 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.</p> <p>5. Page 1-1, Line 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.</p> <p>6. Page 1-32, Line 10, Section 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.”</p> <p>7. Pages – all: Suggest doing a “FIND” function and use nonparticipating instead of civilian throughout the document</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The requested revisions to the document noted in the comment will be included in the JPARC Final EIS.</p>
G0025-3	<p>14. Page 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</p>	<p>Proposed 115 dB and 130 dB peak (PK 15[met]) noise contours are shown in Figure 3-26. While the 115 dB contour (dashed pink line) does extend</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	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.	beyond the boundaries of DoD-owned land in some places, the 130 dB contour (solid pink line) is entirely within DoD-owned land. Peak noise levels of between 115 dB and 130 dB are typically associated with a 'moderate' risk of complaints from affected persons while peak noise levels of 130 dB or higher are associated with a 'high' risk of complaints. The discussion on page 3-187 line 31 identifies 130 dB peak noise levels extending to non-DoD land as an impact that would have been of particular concern. However, analysis results indicate that 130 dB peak noise levels would not extend onto land not owned by the DoD, and peak noise level changes under the action alternatives would not result in noise impacts that would be expected to be considered significant.
G0025-4	<p>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.</p> <p>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.</p> <p>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.</p> <p>Attached are comments/concerns found during the review of the EIS.</p> <p>Thank you for the opportunity to comment. We look forwards to continuing the positive and long lasting relations the FAA has with the DoD.</p>	Valuable input has been received from our FAA representatives during the drafting of this EIS. Indeed, several proposals have been modified in direct response to feedback from the Military Operations Specialist and Air Traffic Representative. Draft Aeronautical Proposals are pending decisions on preferred alternatives.
G0026-1	The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization	Thank you for acknowledging the public comment extension on the Draft EIS. Given the feedback provided during the public hearings and Draft EIS review process, the Army and Air Force, on behalf of ALCOM, extended the

Table N-5. Government Response to Comments (*continued*)

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	<p>and Enhancement Draft Environmental Impact Statement (DEIS).</p> <p>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."</p> <p>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.</p>	<p>Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p>
G0026-2	<p>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.</p> <p>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.</p> <p>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). 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</p>	<p>The importance of aviation in Alaska and the contribution general aviation makes toward the economy of Alaska is discussed in Section B.12.3.3, Key Industries in the EIS Study Area. Army and Air Force representatives are committed to working with your Department and other stakeholders through meetings and other means to help find those solutions that would best serve both military training and civilian aviation needs.</p>

Table N-5. Government Response to Comments (*continued*)

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	those of the civilian population as they are supported by the civil aviation industry.	
G0026-3	<p>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.</p> <p>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.</p> <p>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). 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.</p> <p>...</p> <p>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.</p> <p>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 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,</p>	<p>The Air Force appreciates the support of mission needs in Alaska and the concerns the Commission has expressed over the JPARC airspace proposals. As noted, the FEIS discusses the significant impacts the Fox 3 and Paxon MOA proposals may have on other land and airspace uses and includes those existing and proposed mitigations that would be pursued to address those impacts. The lower altitudes and expanded airspace proposed for those MOAs are essential in meeting those training requirements discussed in Chapters 1 and 2 for newer generation aircraft and advanced adversary tactics to be successful in a combat environment. However, the manner in which those lower altitudes may be used would be limited to the extent needed to meet those training requirements for both routine training in the Fox 3 MOA and major flying exercises in both the Fox 3 and Paxon MOAs. The potential adverse effects the JPARC airspace proposals may have on other aviation interests will be examined further by the FAA in cooperation with the Air Force and Army proponents for each proposal to determine if and how each can be implemented in a safe and efficient manner. The potential impacts the Fox 3 and Paxon airspace proposals may have on wildlife habitats, hunting seasons, and other such concerns noted in the comments are addressed in the FEIS Biological, Land Use, and other applicable analyses and associated mitigations along with separate responses to comments. Both the Air Force and Army will be working with all concerned government agencies and key stakeholders, as appropriate, to discuss and collaborate on those viable options that will best serve the mutual needs of all military and civilian interests. Your continued support of our mission needs and assistance in finding those reasonable solutions will be needed to help us achieve that important objective.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>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.</p> <p>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).</p> <p>The DEIS (Appendix K, page K-9) proposes the following mitigation for the Fox 3 MOA and the proposed Paxon MOA is designated:</p> <p>“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.”</p> <p>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</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>suggest that if the Paxon MOA is designated, it should be limited to high altitude use only.</p> <p>...</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>...</p> <p>To avoid significant adverse impacts to hunting activities regulated under the State of Alaska's general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption</p>	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>of big game hunting in these areas during the peak seasons.</p> <p>Fox 2 MOA and Eielson MOA</p> <p>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.</p>	
G0026-4	<p>Special Use Airspace Information Service</p> <p>The Special Use Airspace Information Service (SUA IS) 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.</p> <p>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.</p> <p>The DEIS (Appendix K, page K-8) proposes the following mitigation measure:</p> <p>“Pursue funding for any communications enhancements that may be needed to expand coverage within those expanded SUA areas.”</p> <p>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</p>	<p>The SUAIS has been a most successful tool for informing the aviation community of the scheduled and real-time use of the training airspace and it would be important to expand these communications capabilities to those areas where this coverage is lacking. As with such government needs, the mitigation must state that funding will be pursued to make those enhancements pending the approved expansion of the proposed airspace. Effort will be made to obtain the funding needed for these essential communications enhancements, as applicable.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	should be in place before any expansion of the Fox 3 MOA or the designation of the Paxon MOA occurs.	
G0026-5	<p>Unmanned Aerial Vehicle Corridors</p> <p>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 significant concerns about the designation of restricted air airspace for operation of UAVs in this area.</p> <p>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 –</p> <ol style="list-style-type: none"> (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. <p>(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.</p>	<p>Pending future decisions on how the provisions of that Public Law will be implemented, the UAV corridor alternatives were proposed as restricted areas with the Certificate of Authorization alternative to examine those impacts the more restrictive airspace would have on other airspace uses in each corridor area. The manner in which these corridors would be established will be as determined by the FAA in their study of the JPARC airspace preferred alternatives. Regardless of their designation, all viable options would be explored to help meet UAV training requirements while minimizing adverse effects on nonparticipating air traffic in those areas.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>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.</p>	
G0026-6	<p>FOX 3 MOA Expansion and New Paxon MOA</p> <p>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).</p> <p>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.</p> <p>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.</p>	<p>The location of the Fox 3 expansion and new Paxon MOA were driven by factors and needs described in Section 1.3 of the DEIS and the JPARC Master Plan, and make use of existing military airspace. The notes for Table 3-12 have been revised in the FEIS to clarify the acreage of State land disposals and the relative increase in private land that this category represents. Similarly, the total acreage reported for Native land includes Native allotments. The commenter is correct that “privately owned BLM land” refers to lands that have been conveyed to private ownership. This is also clarified in the table notes in the FEIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0026-8	<p>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.</p> <p>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.</p> <p>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 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).</p> <p>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:</p> <p>"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</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas that are not already included in mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>