

N0033

2012-2013 Hunt conditions: Copper Basin MOOSE CSH

Page 6 of 6

taken under federal or state regulations. All moose taken (that do not meet general antler restrictions) by Copper Basin Moose CSH participants within the CSH area will count against the up to 70 any-bull moose allowed for the CSH hunt.

In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Moose CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group's member households' required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by October 20. Additional supplemental reports can be submitted after October 20, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Moose CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Moose CSH hunts. Group coordinators are encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.

The written report must include, at a minimum:

1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Moose CSH permit; and
2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Moose CSH permit; and
3. The number of moose taken in federal subsistence hunts by those hunters also participating in the Copper Basin Moose CSH hunt; and
4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event.

Some information in these reports may be subject to state confidentiality laws.

Deliver or mail reports to: ADF&G Copper Basin CSH
P.O. Box 47
Glennallen, AK 99588

FOR MORE INFORMATION

Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461.

Send completed applications to your local ADF&G office, or:
ADF&G Copper Basin Community Subsistence Hunt
333 Raspberry Road
Anchorage, AK 99518

The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526 ; U.S. Fish and Wildlife Service, 4401 N Fairfax Drive, MS 2042, Arlington, VA 22203; Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers. (VOICE) 907-465-6077. (Statewide Telecommunication Device for the Deaf) 1-800-478-3648; (Juneau TDD) 907-465-3646; (FAX) 907-465-6078; For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465-4176.

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright



USE BLACK BALLPOINT PEN ONLY. You MUST PRINT NEATLY within the boxes and use ALL CAPITALS.
Due to the use of scanning technology, failure to do so could lead to your application being rejected.

[illegible][illegible]

97

STATE

7/18/2008

[illegible]

FIRST NAME	MI	LAST NAME	SUFFIX: (JR., SR., ETC.)	MM	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

10. *Journal of the American Medical Association*, 1990; 263: 1000-1001.

[illegible]

ROME PHONE NUMBER () -

CELL PHONE NUMBER

 $(\boxed{} \boxed{} \boxed{}) \boxed{} \boxed{} - \boxed{} \boxed{} \boxed{}$

All contact information provided is
subject to public disclosure.
DO NOT SUBMIT
Unlisted Phone Numbers.

EMAIL ADDRESSES

[illegible]

GROUP COORDINATOR'S SIGNATURE _____

DATE _____

FIRST NAME										MI	LAST NAME										SUFFIX: (JR., SR., ETC.)			MM	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

[illegible][illegible]

HOME PHONE NUMBER () -

TELEPHONE NUMBER

() -

All contact information provided is
subject to public disclosure
DO NOT SUBMIT
Unlisted Phone Numbers.

Group Number _____

2012-				-		
-------	--	--	--	---	--	--

Community Harvest Program Type

☐ Moose **OR** ☐ Caribou

To ADF&G Staff:

- 1) Have Group Coordinator complete the form above
- 2) Group Name, Mailing Address, and Group Coordinator sections must be completed and signed before proceeding
- 3) Group Coordinator must specify whether this application is for the Moose or Caribou program. If necessary they can fill out an additional application and apply for both programs.
- 4) A Group Number can be retrieved from:
WinfoNet > Traditional Use Permits > Copper Basin Community Harvest
- 5) Photocopy this form and provide copy to Group Coordinator

REVISION 20110315

N0033**Additional Household Members Age 10 and Older**

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH DD	YYYY	DATE
ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID						
SIGNATURE						
DATE						
ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID						
SIGNATURE						
DATE						
ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID						
SIGNATURE						
DATE						
ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID						
SIGNATURE						
DATE						
ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID						
SIGNATURE						
DATE						
ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID						
SIGNATURE						
DATE						

When you have completed
this form return it to:

Group Coordinator

Revised 20110308

N0033

ATTACHMENT D

Page 1 of 6



ALASKA DEPARTMENT OF FISH AND GAME
Copper Basin CARIBOU
Community Subsistence Harvest Permit
PROGRAM 2012-2013



HUNT ADMINISTRATION

Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game's statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.

COPPER BASIN CARIBOU CSH PERMIT

According to regulations found at 5 AAC 92.072 *Community Subsistence Harvest Hunt Area* and at 5 AAC 92.052 *Discretionary Permit Hunt Conditions and Procedures*, ADF&G may issue community-based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area. The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) *Community Subsistence Harvest Areas*), hereafter referred to as the Copper Basin CSH area.

The CSH permit program allows communities or groups of 25 or more to apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin caribou CSH permit, a Copper Basin moose CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.

The hunt conditions in this Copper Basin Caribou CSH permit program are made for the purposes of notifying the community/group of users of how to use caribou in a manner consistent with the customary and traditional use pattern described in the board's 2006 and 2011 findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG and 2011-184-BOG), as well as to ensure an orderly administration of the CSH permit program and hunt (CC001).

A community or group may possess only one (1) Copper Basin Caribou CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Caribou CSH group per regulatory year. The Copper Basin Caribou CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Caribou CSH permit is the responsibility of the community or group coordinator.

APPLICATION PROCESS

THE COMMUNITY OR GROUP COORDINATOR

In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Caribou CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Caribou CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Caribou CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Caribou Harvest Permit to each coordinator.

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright

N0033

2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

Page 2 of 6

For 2012-2013, the group application period will be November 1 – December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:

- 1) at least 25 eligible group members have applied (including the group coordinator), and
- 2) all caribou CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first time CSH groups).

Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050 *Required Permit Hunt Conditions and Procedures*. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see "For More Information," below).

There is no limit to the number of communities or groups that may apply for a Copper Basin Caribou CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.

INDIVIDUALS/HOUSEHOLDS

Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.

A "household" means that group of people domiciled in the same residence per 5 AAC 92.990 (23) *Definitions*.

By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (*Game Management Unit 13 Caribou and Moose Subsistence Uses*).

ADF&G will issue one (1) Copper Basin CSH caribou harvest ticket/report to each household (the bag limit is 1 caribou / household).

Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter's license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter's possession until the animal has been delivered to the location of processing for human consumption.

Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the final season, even if the hunter did not hunt or did not take an animal. This hunt may close early; it is the hunter's responsibility to check for Emergency Closures. Hunters may also report online.

PARTICIPANT ELIGIBILITY

All household members subscribing to the Copper Basin Caribou CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright

N0033

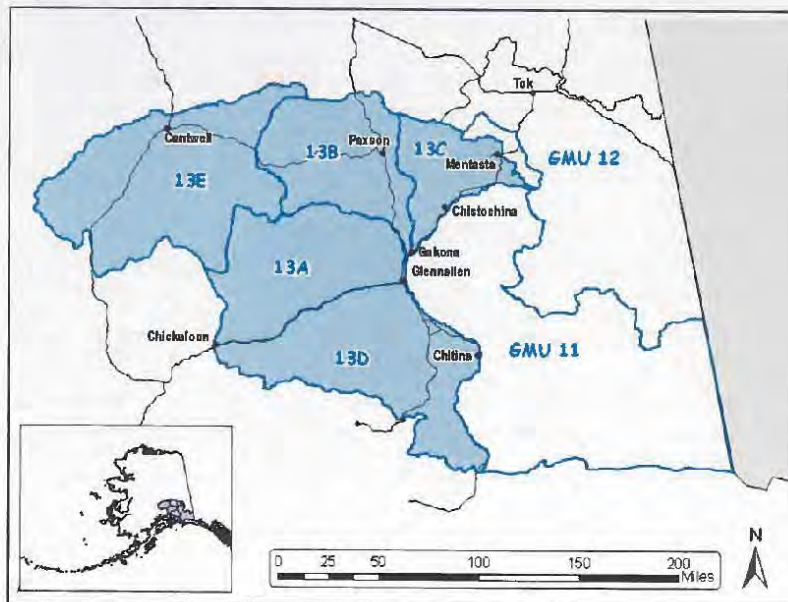
2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

Page 3 of 6

- No member of the household can apply for any drawing/Tier I/Tier II/registration caribou hunts, or hold general season caribou harvest tickets (unless the hunt occurs after the close of the CSH hunt and the bag limit is higher).
- No member of the household can apply for drawing/Tier I/Tier II/registration moose hunts outside the Copper Basin CSH hunt area.
- All household members agree to hunt moose and caribou only within the Copper Basin CSH hunt area.
- No member of the household can be on the Failure to Report (FTR) list.

COPPER BASIN CSH PERMIT HUNT AREA, AND AREA OPEN TO CARIBOU HUNTING

The Copper Basin CSH permit hunt area includes all of Unit 11, Unit 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off) per 5 AAC 92.074 (d). Due to conservation concerns for adjacent caribou herds, only Unit 13 is open to caribou hunting under the terms of a Copper Basin Caribou CSH permit.



OPEN SEASONS AND BAG LIMITS

The Copper Basin Caribou CSH season is: August 10 – September 20, and October 21 – March 31. The bag limit is one (1) caribou per household. For conservation reasons, the season and bag limit may be

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright

N0033

2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

Page 4 of 6

modified by ADF&G emergency order. Up to 300 caribou can be taken under the Copper Basin Caribou CSH permit program (applies to all groups collectively).

DESIGNATED HUNTERS

The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest wildlife resources on behalf of the members of the community or group. To take a caribou on behalf of another household (beneficiary), a hunter must carry both the beneficiary's and their own CSH caribou harvest ticket in the field while hunting. The harvested caribou must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.

HUNT TERMS AND CONDITIONS

Customary and traditional uses of Nelchina caribou are thoroughly described in 2006-170-BOG and 2011-184-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Caribou CSH hunt must salvage for human consumption:

1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the heart, liver, kidneys, and fat; and
2. Prior to October 1, meat of the frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring caribou harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group / community coordinator.

CUSTOMARY AND TRADITIONAL USE PATTERN

The edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt must be used for human consumption and may not be sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the Unit 13 board findings summarized below:

1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area.
2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible.
3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area.

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright

N0033

2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

Page 5 of 6

4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area.
5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Caribou CSH permit.
6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge associated with use of all parts of the harvested animal.
7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, including customary trade, barter, and gift-giving.

In order to observe this pattern, a portion of the edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. In addition, hunters who have harvested their first caribou should give a portion to other members of the community or group.

8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Nelchina caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.

REPORTING

Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. If the season is closed early by emergency order, unsuccessful (and did not hunt) reports must be returned within 15 days of the closure. Hunters may also report online.

Failure to report may jeopardize sustained yield management of the Nelchina caribou herd and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.

To better address the subsistence needs of Copper Basin Caribou CSH participants, the board requested that all caribou harvested by CSH participants within the CSH area be accounted for, regardless of whether taken under federal or state regulations. All caribou taken by Copper Basin Caribou CSH participants within the CSH area will count against the up to 300 caribou allowed for the CSH hunt.

In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Caribou CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group's member households' required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by April 30. Additional supplemental reports can be submitted after April 30, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Caribou CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Caribou CSH hunts. Group coordinators are

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright

N0033

2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

Page 6 of 6

encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.

The written report must include, at a minimum:

1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Caribou CSH permit; and
2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Caribou CSH permit; and
3. The number of caribou taken in federal subsistence hunts by those hunters also participating in the Copper Basin Caribou CSH hunt; and
4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event.

Some information in these reports may be subject to state confidentiality laws.

Deliver or mail reports to: ADF&G Copper Basin CSH
P.O. Box 47
Glennallen, AK 99588

FOR MORE INFORMATION

Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461.

Send completed applications to your local ADF&G office, or:

ADF&G Copper Basin Community Subsistence Hunt
333 Raspberry Road
Anchorage, AK 99518

The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526 ; U.S. Fish and Wildlife Service, 4401 N. Fairfax Drive, MS 2042, Arlington, VA 22203, Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers: (VOICE) 907-465-6077; (Statewide Telecommunication Device for the Deaf) 1-800-478-3648, (Juneau TDD) 907-465-3646; (FAX) 907-465-6078. For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465-4176

November 8, 2011

©ADF&G www.adfg.state.ak.us/copyright



USE BLACK BALLPOINT PEN ONLY. You **MUST PRINT NEATLY** within the boxes and use **ALL CAPITALS**.
Due to the use of scanning technology, failure to do so could lead to your application being rejected.

Group Number
2012- -
Community Harvest Program Type
☐ Moose **OR** ☐ Caribou

If you are applying for both moose and caribou hunts you must fill out separate applications

CITY										STATE					ZIP CODE						

HOME PHONE NUMBER () -

All contact information provided is subject to public disclosure—do NOT submit unlisted phone numbers.

FIRST NAME										MI	LAST NAME										SUFFIX (JR., SR., ETC.)			MM	DD	YYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

I hereby certify that I am the applicant and all of the information I have provided in this application is true and correct. I understand some of this information is subject to public disclosure.

Signature (REQUIRED) _____

Date _____

FIRST NAME										MI	LAST NAME								MM	DATE OF BIRTH DD		YYYY				

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

SIGNATURE

DATE _____

FIRST NAME										MI	LAST NAME										MM		DATE OF BIRTH DD		YYYY			

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE (O)

SIGNATURE

DATE _____

FIRST NAME										NI	LAST NAME										MM	DATE OF BIRTH DD		YYYY		

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID

SIGNATURE _____

DATE _____

Providing false information on this application is subject to a maximum penalty of either a \$10,000 fine or 1 year imprisonment, or both, per 5 AAC 92.020, 5 AAC 92.062, AS 18.05.420, AS 18.05.925 and AS 11.56.210. If requested by ADF&G or Alaska Wildlife Troopers to provide additional information to support answers on your application, you must comply or you will be cited.

N0033

Additional Household Members Age 10 and Older

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

FIRST NAME	MI	LAST NAME	MM	DATE OF BIRTH	DD	YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE _____ DATE _____

**When you have completed
this form return it to:**

Grass Coordinator

Revised 20110308

N0034

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0034	paul roderick	president	talkeetna air taxi	General (to the EIS), 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	<p>This comment is submitted by Talkeetna Air Taxi (TAT) a FAR part 135 air taxi headquartered in Talkeetna, Alaska. TAT owns and operates 8 aircraft and is one of the largest air services in the area. The comments will concentrate on the proposed expansion of the Fox 3 MOA. Most of the clients we fly into the mountains and rivers in the Talkeetna area including the Talkeetna Mountains expect a natural pristine environment that is relatively free of pollution and noise. The user groups that frequent the Talkeetna Mountains are as follows: rafters on the Talkeetna River, climbers and skiers on the glaciers and high peaks in the Mount Sovereign area, hikers in the lower tundra mountains, hunters, and photographers. These user groups are very concerned with the expansion of the Fox MOA and feel this will potentially ruin their experience in the mountains. The central theme stems from both the low level flight potential (500ft) and the expansion of it. One of the great draws of the Talkeetna Mountains is that is is far from any large groups, a quiet environment, and relatively close to Talkeetna. It offers a Brooks Range type experience that is a fraction of the cost. We as an air service feel a need to protect this type of environment for there are few left. Once word gets out that it is in a hot MOA that is approved for low level ops with military aircraft its reputation could be ruined in short order. The next concern is potential conflict with our aircraft and the low level operations. We operate with military aircraft in the Susitna MOA and the Denali area. We have had conflict with fighters straying from the MOA and entering Denali Park. The concerning aspect is the aircraft are not tuned to the common frequency. We have complained over the years but there has not been any acknowledgement. We feel operations in the expanded FOX MOA will increase the risk of a potential mid-air and our pilots are very concerned. Hunters in town of Talkeetna have voiced concern about the low level operations by military aircraft. They feel this could disrupt caribou migration, breeding and even the hunt. Climbers and skiers are concerned about potentially being avalanched by the effects of low flying aircraft and sonic booms. As a pilot looking at an aviation map I am amazed there needs to be expansion to the MOAs.</p> <p>Galena, Stony, Susitna, Fox, Delta....all consume hundreds of square miles! The proposed Susitna Dam has increased air traffic and should be addressed in your study. In closing we feel very strongly that the no action alternative should be chosen. Thanks.</p>

N0035

From: Ruth McHenry [REDACTED]
Sent: Monday, July 09, 2012 11:54 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

July 9, 2012

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

JBER, AK 99506

Re: JPARC Modernization and Enhancement DEIS

Gentlemen:

Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. All share an appreciation for the region as it is: scenic and wild, with the chance to see interesting wildlife. Most of our members also engage in subsistence activities in the region. Following are our comments on the JPARC Modernization and Enhancement Draft Environmental Impact Statement (DEIS). Our comments are confined to the FOX and Paxson Military Operations Areas (MOAs).

We are completely opposed to Alternatives A and E in the JPARC Draft Environmental Impact Statement. We prefer the No Action Alternative, but only because no alternate was presented that would have addressed the current flagrant violations of horizontal and vertical airspace and of supersonic speeds below FAA limits.

DEIS FAILS TO ADDRESS SIGNIFICANT ISSUES THAT WERE RAISED IN SCOPING:

Failure to Discuss Violations by Air Force Jets

N0035

Airspace violations are not rare: Our members and others have observed Air Force jets flying below the required 5000 feet AGL in the Fox 3 MOA, training below 18,000 feet in the Paxon ATCAA, and flying at supersonic speeds when they are below required minimums. Our organization raised this issue in our scoping comments. The Bureau of Land Management documented specific incidents. (See v. II, A-45 and A-46.) I believe that other commenters also raised this issue. We have been unable to find any reference to this issue in the DEIS, other than including the BLM documents and mentioning the toll-free number that citizens can use to report jet noise. Noise is clearly not the only issue here, and the DEIS does not—as far as we can determine—disclose that there are violations.

Our organization's scoping comments specifically requested that this issue be addressed, and we suggested mitigations: "All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1."

Failure to Address Important Cumulative Impacts

Susitna Dam:

The proposed Susitna-Watana dam is a huge project for which the Federal Energy Regulatory Commission (FERC) is preparing an Environmental Impact Statement. It has strong backing from the state legislature, which in the summer of 2011 provided the Alaska Energy Authority with \$66 million to study it; therefore, it is "reasonably foreseeable." The dam's impacts to wildlife could be substantial, as evidenced by ADFG embarking on multi-year studies on the Nelchina caribou herd, moose, and ptarmigan, while other entities are conducting studies of potential impacts to migratory birds. The dam site would lie beneath the Fox 3 MOA, where this DEIS proposes to lower the minimum flight level from 5,000 feet above ground level (AGL) to 500 feet AGL. According to scoping comments provided by ADFG and USFW on the JPARC proposal, these low-level flights are of particular concern with regard to many wildlife species, including the moose, the Nelchina caribou herd, and migratory birds being studied for the Susitna-Watana project. Also, one of the proposed access roads, departing from the Denali Highway, underlies the Fox 3 MOA. Certainly this is a cumulative impact that should have been mentioned.

Mineral Exploration and Mining:

The DEIS (vol. I, page 3-59) addresses mining claims and active mines in the region. It depicts them in Figure 3-12. Curiously, it does not list any of them as having cumulative impacts in conjunction with the JPARC proposals. To take one example with which our organization is very familiar, Pure Nickel, Inc., has been conducting exploratory drilling on its "MAN" nickel/copper/platinum claims, which include important wintering and rutting grounds for the Nelchina caribou herd. This is of concern to resource managers. As the

N0035

Alaska Board of Game wrote in its March 26, 2008 letter to the Governor, "We recognize the potential for mineral extraction in this area and in associated mineral leases, but remain convinced the long-term value of maintaining wildlife habitat far outweighs the potential benefits of possible development projects known at this time." The claims area is also an important subsistence area and is a favorite destination for hikers, paddlers, photographers, mushers, and tour companies. To date, multinational ITOCHU has invested \$17 million on these claims, making it sufficiently foreseeable to deserve mention. As another example, the DEIS mentions active mining north of the Denali Highway at Valdez Creek, but does not discuss whether there might be cumulative impacts with regard to subsistence, recreation, or wildlife.

In spite of the all the above, the DEIS says, with regard to cumulative impacts to biological resources: **"Cumulative Impacts of JPARC Proposals with Other Non-Military Actions.** No substantive non-military actions have been identified for the areas under the proposed expanded Fox 3 or Paxson MOAs; therefore, contributions of non-military actions to cumulative effects in the Fox 3/Paxson MOA proposal area would be insignificant." (DEIS v. I, page 4-27)

Climate Change:

Our scoping comments stated, "Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika." The only reference that the DEIS makes to climate change is on page 4-17, where air quality is discussed. There is no mention of how implementation of Alternative A or E might interact with climate change to affect biological resources. For instance, how might low level flights and/or sonic booms affect denning wolverine?

DEIS UNDERSTATES IMPACTS:

Noise:

The DEIS gives 123 dB as the loudest noise that would be heard in the Fox 3 and Paxson MOAs during low-level (500 feet AGL). Presumably, this would be generated by subsonic flight, because supersonic flight is not supposed to be conducted below 5,000 feet AGL or 12,000 feet AGL. "This degree of noise would likely annoy or startle persons overflown," (DEIS v. I, page 3-79). However, according to the *Canadian Journal of Otolaryngology*, just 120 dB exposure can injure the ear. The Final EIS should acknowledge ear damage and return the minimum flight level to 5000 feet AGL to prevent such damage.

Within the DEIS, we have not found any information on the decibel level of a supersonic jet flying at 500 feet AGL or 1000 AGL. As documented by the Bureau of Land Management (DEIS v. II, A-25 and A-26), *supersonic flight already does occur* at 1000 feet AGL or even hundreds of feet AGL. "Annoy" and "startle," the words used in the DEIS, hardly describe the reactions of those exposed. "Terrify" is more accurate. I have experienced this myself while berry picking with a child a few miles east of the Fox 3 MOA, and I thought that

N0035

a bomb had dropped nearby. (See Copper Country Alliance Scoping Comments.) The Final EIS should acknowledge that these events occur and will become more common, should quantify the noise level, should describe impacts to wildlife and humans, and should describe the ways that it proposes to address the problem of too-low supersonic flight.

MITIGATIONS:

1. **Keep the minimum flight level at 5,000 feet AGL.** The proposed 500-foot AGL would put civil aviation in harm's way; disrupt wildlife at critical times; disrupt human activities such as subsistence, wildlife viewing, hiking, and paddling; and damage the ears of humans and wildlife.
2. **Enforce restrictions on pilots flying Air Force jets.** Violations of minimum flight level, MOA boundaries, and supersonic flight minimums have been rampant. Somewhere, the system is breaking down. Restrictions and the consequences of violations should be emphasized before each flight. Flights should be closely monitored. Discipline should be swift and certain. Foreign pilots who violate restrictions should be sent home.
3. **Conduct any supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.**
4. **Create a civilian oversight group with members selected by affected communities and interest groups.** Meet at least quarterly to exchange information. Fund the meetings and participants' meeting-related expenses.
5. **Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas.** Solicit and take the advice of biologists in the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the Bureau of Land Management.
6. **Establish a no-flight zone over the Delta and Gulkana Wild and Scenic Rivers and 10 miles on each side of them.** This means no flights, at any altitude.
7. **Establish a no-flight zone over the Denali and Richardson highways, and 10 miles on each side of them.** This means no flights, at any altitude.

Thank you for this opportunity to comment and for planned future opportunities.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry, Volunteer Staff

N0035

Ruth McHenry, Volunteer Staff
Copper Country Alliance
HC60 Box 306T
Copper Center, AK 99573
907-822-3644

5

N0036

[REDACTED]
From: William (Bill) Glanz [REDACTED]
Sent: Monday, July 02, 2012 4:33 PM
To: ALCOM J08 Admin Box
Subject: EIS

I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.
Thanks William L. Glanz Central, Alaska [REDACTED]

N0037

From: Wellwood Center [REDACTED]
Sent: Tuesday, July 10, 2012 2:59 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

Re: JPARC Modernization and Enhancement EIS

ALCOM Public Affairs:

I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.

The Delta and Gulkana Wild and Scenic Rivers, the beautiful and peaceful Tangle Lakes, the Denali Highway itself with its wild and expansive vistas, all are places dear to the souls of many people, both those who live in this area and those who visit, who find these regions valuable beyond price for the increasingly rare opportunities they give us to experience the world as it was created.

In the military's honorable quest to protect us, let's not damage those things that are truly worth protecting.

Thank you for your thoughtful consideration of these concerns.

--Dave Wellman
Business Owner (Wellwood Center Bed and Breakfast) Board Member (Wrangell Institute for Science and Environment, Copper Country Alliance) Executive Director (Wellwood Conservancy)
Retired science teacher (Kenny Lake School)

N0038

From: Coalition for Susitna Dam Alternatives [REDACTED]
Sent: Thursday, July 05, 2012 5:53 PM
To: ALCOM J08 Admin Box
Subject: Public Comment on Draft EIS for Modernization and Enhancement JPARC

7/5/12

Board of Directors
Coalition for Susitna Dam Alternatives (CSDA)

In the best interests of the public, CSDA wants to point out that under Cumulative Impacts, the draft has not mentioned the proposed Susitna Dam. This should be done. Include the following:

Proposed Susitna-Watana Hydroelectric Project

This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide and will be a focal point for increased human presence in the project area.

--
Phone contact:
907 733 5400
Website:
www.susitnadamalternatives.org

N0039

[REDACTED]

From: Pamela Miller [REDACTED]
Sent: Monday, July 09, 2012 12:43 AM
To: ALCOM J08 Admin Box
Cc: Jenna Hertz; [REDACTED]
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: NAEC JPARC Final Comments 7-9-2012.pdf

Please find our organization's comments, attached.

Pamela A Miller
Arctic Program Director
Northern Alaska Environmental Center
830 College Road
Fairbanks AK 99701
(907)452-5021 x24
(907)441-2407 (cell)
www.northern.org

N0039



July 9, 2012

Lieutenant General Dana Atkins
ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506
Via E-Mail: alcom.i08@elmendorf.af.mil
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission

Dear Lieutenant General Atkins,

The Northern Alaska Environmental Center (NAEC) thanks you for the opportunity to submit comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement (EIS) on behalf of our organization and its members. Our non-profit conservation organization promotes conservation of the environment and sustainable resource stewardship in Interior and Arctic Alaska through education and advocacy. We have over 1,500 members most of whom live, work, and recreate in the areas that will be affected by the proposed JPARC activities.

Recommended Alternative

Based on the alternatives listed in the proposal thus far, we recommend the no action alternative. We will address in more detail some particular issues that affect the quality of life of Fairbanks members and elsewhere in the Interior of Alaska, which primarily involve the FOX 3 and Paxson MOA addition, Tanana Flats Training Area Roadway Access and expansion of the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Area. We also recommend consideration of a new alternative that would decrease level of existing impact in the national conservation areas which include preserve, refuge, and wild and scenic rivers, as well as throughout the Yukon River watershed.

FOX 3 MOA and Paxson MOA

The eastern Alaska Range is an important area to many of our members, who spend considerable time deep in the mountains. Many have cabins within FOX 3 and within the additions. Lowering AGL's from 5,000 to 500 feet is a dramatic change and one that has negative impacts to various user groups and potential impacts to wildlife. Planes flying at an altitude of 500ft would produce cumulative impacts to people and fish and wildlife from noise disturbance including human health and wildlife reproduction and energetic stresses, impacts to sport and subsistence hunting, fishing, and other activities, effects on federal and state conservation areas and other public lands, wild lands and wilderness values including solitude and intact ecological system integrity, recreation and tourism, effects on bush and commercial flight safety, and air and water quality impacts. We are also concerned

A 501 (c) (3) NOT-FOR-PROFIT ORGANIZATION
830 COLLEGE ROAD, FAIRBANKS, ALASKA 99701
PHONE (907) 452-5021 • FAX (907) 452-3100 • WEB www.northern.org

N0039

about the effects on Pacific salmon, migratory birds, marine mammals, and other wildlife that migrate from the Gulf of Alaska to sub-arctic and arctic habitats and may be affected by the Gulf of Alaska Temporary Maritime Activities Area.

Wildlife

As the EIS states, the Fox 3 MOAs and the new Paxson MOA include some of the largest hunting grounds for caribou as well as lambing and rutting areas for caribou and Dall sheep. It is vital that mitigation measures and flight restrictions be put into place to protect calving grounds, lambing areas, and rutting areas indicated in Figure 3-5 and 3-6. We support the establishment of a minimum overflight altitude of 3,000 feet AGL over the Delta and other Caribou Herd calving areas from May 15 to June 15. Judging by Table 3-11, not much caribou habitat has been spared in the Expanded Fox 3 MOA as 94% of the airspace consists of caribou habitat. We recommend measures to reduce this to 75% or less to protect this vital subsistence resource. The EIS only cites one study of the impacts on Dall Sheep. One study is inadequate. In terms of wildlife, NAEC believes Alternative E superior to Alternative A because it impacts less acreage of wildlife habitat. The No Action Alternative is our preferred alternative.

The EIS should also consider impacts on smaller, less iconic animals and migratory birds. Figure 3-7 is inadequate in showing the diversity of Migratory Waterfowl Habitat underlying the Fox 3 and Paxson MOAs. Since the EIS states that studies have shown that the visual aspect and peak noise level (Lpk) of overflights diminish rapidly with increasing altitude of overflight, we recommend that you raise the 500 foot AGL to at least 1,000 feet in this critical waterfowl area.

Hunting and Recreation

Hunters are perhaps the most common user group throughout the eastern Alaska Range. AGL's of 500 feet will certainly impact the experience of their hunt -- from the loss of a wilderness experience to the potential and unpredictable herd scattering that could occur when an aircraft traveling at or near mach speeds nears by. The proposal would affect recreational visitors to the Denali Highway -- including its surrounding public lands-- which is a favorite area to bring the important tourism visitor sector "visiting friends and relatives" as well as independent travelers and others. NAEC urges the Air Force to consider limiting air traffic during the months that ADF&G data has shown high visitor use and hunter success (namely mid-August, late September, and end of October to early November). The Paxson MOA would certainly make operations more difficult for local pilots and their clients, wildlife, and ground travelers.

Mountaineering

Mountaineering is another common use for which lowered AGL's and increased MOA's would bring negative impacts. Sonic booms from jets have been known to trigger avalanches on slopes that otherwise would remain stable for mountaineers. In addition, jets flying so close to mountaineers -- who can often be in serious situations in the first place -- presents unnecessary stresses, compromises safety, and also greatly detracts from the experience of solitude which is best exemplified in our great mountain ranges. Such low AGL's may also pose problems for bush pilots who would normally be flying under the MOA's, adding extra expense to traveler's budgets if they are required to add more miles to their flight plans or simply not be able to go. We recommend that the EIS include an analysis of such comments and explain the process for the public to provide documentation of such events.

N0039**Special Areas**

We are especially concerned about this expansion southward to the Lake Louise area and farther eastward on the Denali Highway. In addition to the greater Eastern Alaska Range, there would be substantial impacts to the Tangle Lakes – a very popular birdwatching, camping, hunting, fishing, and paddling destination not currently affected by any MOAs. The proposed 500 foot AGL's would certainly alter the experience of users there, as well as potential stresses to the Nelchina Caribou Herd, which relies on that region for wintering habitat. Many of our members have publicly spoken out about designating the area as a State Wildlife Refuge. The proposed 500 foot AGL's are not compatible with that type of use and land management. We recommend that Tangle Lakes be designated an avoidance area as Lake Louise is proposed to be to minimize impact on residents. This area also includes the Tangle Lakes Archeological District as well as the Delta National Wild & Scenic River.

Noise Pollution

In Table 1-10 of the EIS, the FOX 3 MOA and Paxson MOA are noted to have potential for significant adverse impacts on socioeconomics, noise, safety and land use. Under Alternative A, the noise pollution in the Paxson MOA would increase substantially, from 37 to 54 dB L and noise pollution in FOX 3 MOA would increase from 29 to 49 dB L. In Alternative E, the Paxson levels would increase from 37 to 54 dB L and Fox from 39 to 50 dB L. For these reasons, we do not find that the benefits outweigh the risks in the proposed plan for the addition to FOX 3 and MOA, and therefore request No Action be taken regarding these areas. The military already controls large swaths of airspace and could certainly find a way to use existing resources to fit their mission.

We request that No Action be taken regarding the proposed plan for a Paxson MOA.

Tanana Flats Training Area Roadway Access

The Tanana River is a tremendous resource near and dear to the inhabitants of Alaska's Interior. It is a major tributary of the Yukon River and a vital salmon subsistence river, waterfowl corridor, and transportation corridor for recreationalists and local residents of the interior.

Wetlands and Water

Table 1-10 of the EIS notes that the Tanana Flats Training Area Roadway Access comes with the potential for significant adverse impacts on physical resources including soils and permafrost, water resources, biological resources, and wetlands. We are concerned about potential impacts of the proposed roadway project on the delicate biological balance of this river downstream. Specifically, as the EIS admits, hydrologic studies are needed to ensure that culverts installed along the proposed roads would not produce a discernible change in the hydrologic flow regime of the area. We ask that you consider the potential for significant adverse impacts on subsistence for this project.

The area surrounding the Tanana is wetlands-rich. Sixty-five percent of the Tanana Flats Training Area is wetlands and special care must be taken to preserve the ecosystem integrity of this area to mitigate impacts downstream. Detailed wetlands surveys should be required before this project moves forward. We urge developers to follow the recommended site selection criteria and BMPs in section

N0039

3.8.6 to reduce impacts on water and wetland quality. Sensitive areas for Raptors should be included in the list of criteria developed to reduce adverse effects on page 3-381

Living/Recreating on the Tanana

Many of our members canoe and motor between Fairbanks and Nenana as a recreational and subsistence activity. The population of Fairbanks uses this area heavily for summer salmon fishing and fall moose hunting. Members living on this stretch of the river have complained of shocking noise pollution and disturbance from what they have described as “bombs” in the Tanana Flats Training Area on the East Bank of the river. People on the West Bank of the Tanana should be considered in the Affected Environment section of Socioeconomic impacts.

Yukon River Watershed Impacts

The upper Yukon River watershed already has a high concentration of MOAs (Yukon 2, 3, 4, 5) that can result in adverse impacts to wildlife, recreation, and subsistence resources and users and noise disturbance that is incompatible with the purposes of Yukon-Charley National Preserve, Yukon Flats National Wildlife Refuge, part of Arctic National Wildlife Refuge, and the Birch Creek, Charley, and 40-mile Wild & Scenic Rivers, and we recommend consideration of a new alternative that would decrease level of existing impact in the conservation areas and throughout the Yukon River watershed.

Realistic Live Ordnance Delivery

We believe the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Facility is also unnecessary. We are opposed to additional live ordnance designations and feel those activities should be limited to existing facilities. We have heard from members whose planned expeditions to exit the peaks of the Eastern Alaska Range have already been thwarted upon learning about the restrictions that made it illegal to float down Delta Creek. We are opposed to any additional restrictions that undermine Alaskans’ ability to enjoy their surrounding landscapes.

General Comments

Document and Maps

The DVD copies of this document were fairly easy to navigate and we appreciate the attention put to that. We similarly appreciate Figure 3-10 (Land Status and Special Use Areas in the Fox 3 MOA Expansion and New Paxson MOA Proposal area) in that it delineates land use categories but feel the EIS could go much farther in clearly identifying conservation areas by their individual place names, rather than slight shifts in colors and dash marks. Because the proposed areas encompass such a complicated patchwork of land designations, we recommend that all maps show the boundaries of federal and state conservation areas. This should include parks, refuges, conservation areas, recreation areas, National Wild and Scenic River, proposed wilderness areas, state habitat areas. We believe this will help the public understand incompatible uses and to assess impacts as well as better assess mitigation such as additional seasonal restrictions to avoid effects on wildlife reproduction, migrations, and other sensitive activities.

Energy Conservation and Renewable Energy:

Energy conservation is a core value of our organization. We support and applaud the plan’s efforts to reduce fuel consumption and increase efficiency. We applaud the inclusion of figures like 3-13 that

N0039

shows the Renewable Resources in the Fox 3 MOA and New Paxson MOA Proposal Area, although we do not sense meaningful integration of this data into the EIS or purpose of the expansion. We do not, however think that the most impactful savings can come at the cost of AGL reductions to 500 feet, a height that is jarring and disruptive to wilderness qualities of solitude and quiet that we prize Alaska's remote areas for.

If the military is truly concerned with energy efficiency, it seems that they should do everything in their power to base flights more locally. There is much energy used getting planes to the Yukon-Charlie area from Fairbanks and Anchorage. If the Eielson Air force Base was moved to Anchorage, there would be a huge increase in fuel costs associated with getting the planes to interior-based flight areas. We request that the cumulative impacts of this potential move be addressed in the EIS.

Noise Pollution

We believe additional night hours on existing MOA's will pose great impacts to residents, recreational and subsistence users and wildlife. We ask that the Air Force exercise some restraint and limit its noise impacts on these places by using existing policy regarding night hours. None of the alternatives adequately address the cumulative impacts of the existing MOA night flying disruptions. In the materials submitted to the public, there is no definition of what a "documented noise sensitive area" is or what restrictions, if any, might be associated with these areas.

Flight Numbers and Hours

While there are alternatives described with different extensions of Proposed Night Joint Training for all training purposes versus major flying exercise, there is no indication of the total number of flights anticipated for each alternative. Alternatives should also be considered that may reduce flight hours or numbers of flights in existing MOAs in consideration of the cumulative impacts.

Thank you for taking the time to read our thoughts on this important matter. We hope to be involved in the future, as do many of our colleagues.

Sincerely,



Jenna Hertz,
Arctic Grassroots Coordinator



Pamela A. Miller
Arctic Program Director

N0040

[REDACTED]

From: Mackenzie Dickson [REDACTED]
Sent: Monday, July 09, 2012 2:01 PM
To: ALCOM J08 Admin Box
Cc: Randy Hansen; Sean Elliott
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: Alaska JPARC Comment.pdf

Good Afternoon,

Attached is EAA's comments to the proposed JPARC expansion.

Respectfully,

Mackenzie Dickson
Government Relations Intern

EAA - *The Spirit of Aviation* - www.eaa.org

[REDACTED]

See you at EAA AirVenture Oshkosh, July 23 - 29, 2012, www.airventure.org

N0040



July 9, 2012

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

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

The Experimental Aircraft Association (EAA), on behalf of over 176,000 general aviation pilots and aviation enthusiasts nationwide, including more than 5,000 members in Alaska, submits the following response to the U.S. Department of Defense (DoD) in regards to the Draft Environmental Impact Statement (DEIS) for the expansion of the Joint Pacific Alaska Range Complex (JPARC).

EAA concurs with the concern of its members who live, work, and fly in the areas included in the DEIS. The impact of the proposed expansion of the JPARC Military Operating Areas (MOAs) to general aviation must be considered due to the importance of general aviation to the Alaskan civilian population. Some of the busiest airspace for general aviation traffic in Alaska lies within the areas included in the proposed expansion. Furthermore, the JPARC lies in close proximity to three of Alaska's largest population centers: Anchorage, Fairbanks and the Mat Su Borough. Busy air routes which link these population centers and their surrounding areas will be impacted by the expansion of the MOAs.

Included in the DEIS is the lateral and vertical expansion of the Fox 3 MOA and the addition of the new "Paxon" MOA. The lowering of the Fox 3 MOA's floor from 5,000 feet AGL to 500 feet AGL significantly diminishes safety and increases the risk of collision between the small general aviation aircraft that frequent this airspace and fast moving military jet traffic. This large decrease in the MOA's floor elevation also severely restricts general aviation pilots to flying at low altitudes which are unrealistic and unsafe in mountainous terrain. This restriction greatly reduces a general aviation pilot's options in the event of an emergency such as an engine failure. Due to these risks, the floor of the Fox 3 MOA should be kept at 5,000 feet AGL and its boundaries should be extended the least amount possible.

The proposed Paxon MOA would also essentially cut off major portions of important air routes that link Southern and Northern Alaska. High amounts of general aviation traffic would be restricted to small corridors, increasing the likelihood of mid-air collisions. The proposed Paxon MOA would also cover a heavily utilized recreational and hunting area. The Paxon MOA should

P.O. BOX 3086 OSHKOSH, WI 54903-3086 • Tel 920.426.6522 • Fax 920.426.6560 • WWW.EAA.ORG

N0040

either be stricken from the proposal completely or restricted to high-altitude operations to minimize risks to general aviation.

These proposals as well as others included in the DEIS are far-reaching and would have a profound impact on general aviation in Southern Alaska. The impact to the livelihoods of Alaskans living in the areas that will be affected by these proposed changes should be carefully considered before any decisions are made regarding the future of the JPARC.

EAA is grateful for the opportunity to comment on this important issue. We kindly ask the DoD to consider the concerns of the Alaskan general aviation community before approving these proposals. We look forward to a reasonable solution so that the needs of both the United States military and the Alaskan general aviation community are met.

Thank you for considering these comments. Please contact us at 920-426-6103 if you have any questions.



Randy Hansen
EAA Government Relations Director

P.O. BOX 3086 OSHKOSH, WI 54903-3086 • Tel 920.426.6522 • Fax 920.426.6560 • WWW.EAA.ORG

N0041

JUL-9-2012 08:51A FROM: AIRMEN'S ASSOCIATION 9072451259

TO: 5525411

P.1



ALASKA AIRMEN'S ASSOCIATION, INC.

July 7, 2012

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

by fax 552-5411 &
email alcom.J08@
elmendorf.af.mil

Re: DRAFT EIS comments on the proposed Joint Pacific Alaska Range Complex Expansion

Dear Sirs,

The Alaska Airmen's Association is a statewide organization with 2500 members dedicated to supporting safe aviation in Alaska. In this letter we hope to define the requirements of the civil aviation community and elucidate industry concerns. Specific areas of the proposal include the expansion of the Fox 3 MOA, the proposed Paxson MOA Low Altitude Structure, IFR Access to MOA Airspace, restricted airspace over the Battle Area Complex south of Delta Junction and the proposed UAV Corridors. Given the importance of the aviation transportation system for all Alaskans we trust the military acknowledges the requirements of the civil aviation community for the safety of all users.

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 Alaskans 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.

N0041

JUL-9-2012 08:51A FROM: AIRMEN'S ASSOCIATION 9072451259

TO: 5525411

P.2

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.

The proposals to establish more restricted airspace for live ordinance 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.

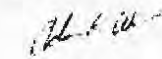
We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training. Corridors allowing UAV's to access training areas is an enormous safety concern. Currently the National Airspace System does not have a mechanism that allows UAV's to harmoniously 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 (SU AIS) 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 SU AIS.

Thank you for the opportunity to comment. We ask that the Military, the FAA and the aviation community continue to work together until we find a solution.

Sincerely,



Adam White
President

N0042

From: [REDACTED]
Sent: Monday, July 09, 2012 3:39 PM
To: ALCOM J08 Admin Box
Subject: [Fwd: JPAEC Response]
Attachments: The Alaskan Aviation Safety Foundation response final.pdf

Sirs, the first email address I got from you did not go through, so am trying a second. Would you please acknowledge receipt of our letter by return email? Carl Siebe

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

Subject: JPAEC Response
From: [REDACTED]
Date: Mon, July 9, 2012 12:31 pm
To: alcom.j08@us.af.mil

Dear Sirs, please find attached comments on the JPARC DEIS from the Alaskan Aviation Safety Foundation that are due today. Would you please acknowledge receipt of our letter by return email? Carl Siebe

N0042

Alaskan Aviation Safety Foundation
2811 Merrill Field Dr.
Anchorage, AK 99501

July 8, 2012

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

Dear Sirs:

The Alaskan Aviation Safety Foundation (AASF) is a non-profit membership driven organization with the central goal to promote aviation safety in Alaska. We had a team review the Joint Pacific Alaska Range Complex (JPARC) Draft Environmental Impact Statement (DEIS) document dated March 2012, which contains proposals for modernizing and changing various features of the airspace and training ranges in the JPARC. We offer the following comments and observations.

Purpose and Need

The National Environmental Policy Act (NEPA) regarding Purpose and Need (40 CFR §1502.13) states, "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." In this DEIS document, the purpose statement (section 1.2) does not document the purpose of the DEIS as we understand it, which is to provide comprehensive training areas for current and future military training. The AASF supports providing comprehensive training areas, but the AASF is not supportive of the purpose stated in the document. We suggest restructuring the purpose to focus on current and future training areas. Section 1.3 containing the Need statement is not focused and does not include the proposed actions as required in §1502.13. We found it extremely difficult, and at times not possible, to connect a need with the proposed actions found later in the document.

The following is our analysis and comment on each of the proposed actions.

Fox 3 MOA Expansion and New Paxon MOA

The USAF has extensive MOAs in Alaska, and in order to justify an expansion NEPA requires an explanation of why the existing MOAs are not adequate. The alternatives section states there is a need for more air space without discussing why the existing MOAs are inadequate, and fails to connect to the stated need in section 1.3. In addition the purpose and need statements in sections 1.2 and 1.3 do not appear to support either alternative A or E. As such, the AASF

N0042

requires additional justification and at this time opposes both the Fox 3 MOA Expansion and the New Paxon MOA.

Section 2.1.1 says the need is to provide a 180 x 60 nautical mile airspace. We submit that the Yukon MOAs already provide more than three times this airspace. There is no explanation why this existing airspace will not provide a realistic training environment that meets the USAF training need.

Section 3.1.1.4 acknowledges adverse impacts, but in NEPA terminology we submit that these impacts are significant and require mitigation. Table ES-2 codes these as significant, which is inconsistent with section 3.1.1.4. The wording in this section does not address mitigation, rather it says (paraphrasing from the section) that the FAA and USAF will study impacts and mitigation measures, and work with civil aviation users to resolve issues. We expect a DEIS to document impacts, rate them significant or not significant, and if significant to propose adequate mitigation. If the SUAIS is proposed as a mitigation measure, we expect the DEIS to show us the translator locations and coverage areas.

Section 3.1.3 Safety is of utmost concern to the AASF. Proposed expansion of the MOAs down to 500 ft will increase the collision risk between civil and military aircraft, aircraft mishap potential, and bird/wildlife-aircraft strike hazards. The AASF opposes this expansion of these MOAs down to 500 ft due to this decrease in both civil and military flight safety. In addition, Table ES-2 codes Safety –Flight for the Fox 3 MOA Expansion and New Paxon MOA as “Potential for significant adverse impacts; Requires management actions or mitigations to avoid or reduce impacts.” While in section 3.1.3.4 Mitigations provides some existing programs/procedures, but states “No further mitigations are proposed for this resource.” This is unacceptable to the AASF, and appears contradictory to the executive summary.

Other impact areas such as noise, biological resources, land use, infrastructure, subsistence, and economic justice likewise need concrete mitigation measures identified.

Realistic Live Ordnance Delivery

The alternatives section discusses the need for more space, mostly “As the technology for new weapons systems continues to evolve, the ground footprint for ordnance delivery continues to expand...” So again we have a need statement in the alternatives section rather than in the need section. The need statement is vague, and appears more as an effort to secure some land now that may or may not be needed in the future. The existing MOAs constitute a huge amount of land and air. What we fail to find, and expect to find in a DEIS analysis, is exactly how much is needed now, why the existing MOAs are not adequate, and a reasonable projection of how much will be needed in the future. There may be some further justification hidden in the lengthy Affected Environment and Environmental Consequences section, but as written we could not connect the sections of this NEPA document into a coherent and well thought out proposal.

N0042

Section 3.2.1.4 looks to be a copy of the airspace mitigation section from the Fox 3 MOA Expansion section. As such our comments above apply to this section too.

Battle Area Complex Restricted Area Addition

The AASF rejects this proposal because the impacts to civil aviation safety are significant, and the proposed mitigation is inadequate. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass. Isabel Pass includes the Richardson Highway 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. During previous EIS analysis of USAF expansion proposals, the aviation community raised the issue about the possible need for restricted airspace. While this is easy expansion area for the military, such expansion causes significant impacts to civil aviation. Section 3.3.1.4 acknowledges potential adverse impacts on airspace. As we stated above, we submit this is very significant by any reasonable measure. Mitigation measures offered are to study the issues, which is not acceptable. Disregard of the NEPA process to identify and mitigate significant impacts causes us distress. The USAF has stated they want to work with us, but this proposal disregards such working together for the benefit of all. The military has other options and this DEIS must explore these other options in detail.

Expansion of Restricted Area R-2205

In general the expansion of R-2205 follows recommendations we have made in comments to previous environmental documents. We remain concerned that sections such as 3.4.1.4 acknowledge potential adverse impacts and the mitigation is to study the issues. This does not adequately comply with the NEPA process.

Night Joint Training

In general we support the need for adequate night training. As aviators we understand this issue. We also find that we need to remind the USAF that noise impacts on the human environment are recognized to be larger at night. The FAA noise analysis process applies a 10 decibel penalty to night noise impacts. Section 3.5.2.4 does not acknowledge this fact. Additional mitigation may be required. We also find it curious that the USAF has not applied administrative relief to your own rules for aviation currency as a way to fix the problem. We would like this DEIS to discuss the potential to administratively modify the USAF rules for pilot night currency.

Unmanned Aerial Vehicle Access

We understand the Military's desire to establish UAV training areas. Furthermore we agree with the airspace analysis paragraph 3.6.1.4 that there are adverse and significant impacts, however this section does not offer any clear mitigation for these adverse and significant impacts. We

N0042

submit aviation safety is likewise impacted. Therefore, based on the airspace management and safety sections we find cause to oppose the proposal.

Missile Live-Fire for AIM-9 and AIM-120

The AASF does not offer any constructive comments. We do find it curious that the impact area is relatively close to Kodiak Island, and not aimed for impact in the southeast portion of the area. We suspect there are reasons that are not articulated in the document, and a DEIS should articulate such reasons.

Further Comments

The AASF has a long history of working with the USAF to provide aviation safety for all users, civilian and military. Our volunteers have always tried to provide fair and balanced comments to USAF proposals. Our membership contains many current and former members of the military. We value the USAF as a legitimate user of the Alaskan airspace, and desire to provide airspace adequate to meet the USAF training needs. With that said, our team struggled to analyze and comment on this DEIS document. Some drawings and submittals have been sub-standard and difficult to read and analyze. This document was 655 pages long, rather than the 300 pages codified in NEPA §1502.7. There are discontinuities between the purpose, need, alternatives, affected environment, and environmental consequences, and we were not able to capture and comment on all of them. A DEIS document compiled to meet the NEPA code should be well laid out and the required sections connected to form a comprehensive and understandable program, and we found this document to be lacking in this regard.

Use of the Naknek, Stony, Galena, and Susitna MOAs are currently part of the military training options for Alaska. From our perspective the Naknek and Stony MOAs provide an alternative to meet the need for expansion of the Fox 3 MOA. Yet their use was not addressed in this document. Again our stated goal is to help the USAF acquire the area needed to meet your training needs, but we are not agreeable to have the USAF keep or bank MOAs all over Alaska that may or may not be needed in the future. Please address the total MOA need in the final EIS.

In summary because of the deficiencies in this DEIS document, the AASF submits this DEIS should be rewritten to follow 14 CFR 1500-1508, also known as the NEPA, and resubmitted. The need still exists for adequate training airspace and ground surface and we look forward to working with the USAF to identify needs and meet those needs.

Respectfully submitted on behalf of the Board of the Alaskan Aviation Safety Foundation.



Carl Siebe, Vice Chairman

N0043

[REDACTED]

From: Steve Baker (AS) [REDACTED]
Sent: Monday, July 09, 2012 4:57 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: ASA JPARC Draft EIS Comments.PDF

Please accept our comments on the Draft EIS for the JPARC expansion.

Thank you,

Steve Baker
Senior ATC Support Specialist
Alaska Airlines
206-392-6204

N0043



July 9, 2012

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

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

To whom it may concern:

As a major air carrier serving the community of Fairbanks and a daily user of the airspace surrounding the Joint Pacific Alaska Range Complex, Alaska Airlines appreciates the opportunity to provide comments on the Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex. The following are our concerns with this proposal:

FOX 3 MOA Expansion and New PAXON MOA Affecting High Altitude Jet Aircraft

Alaska Airlines regularly flies over Northway via J502 between Seattle and Fairbanks. We rely on the most direct routing to ensure profitability and schedule reliability. Under the existing MOA/ATCAA activation, we incur regular and costly reroutes when forced to file via the 63°N corridor due to the J502 route being closed to IFR traffic. Any additional impact posed by an expanded MOA/ATCAA might prove unsustainable for our operation. As Alaska flies and flies consistent and repeatable flight paths via advanced navigation methods, it is conceivable that an enhanced corridor for High Altitude IFR traffic be created that allows efficient transit through military airspace.

Expand Restricted Area R2205, Including the Digital Multipurpose Training Range

As proposed, the expanded R2205 is in the vicinity of the primary arrival and departure Airway (J502). This airspace expansion must be analyzed with consideration of the Fairbanks RNAV SIDs, STARs and RNAV (RNP) approach procedures slated for implementation later this year. All impacts stated in the Draft EIS are based on existing flight tracks and do not consider these new arrival and departure tracks.

Proposed Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicle (UAV) corridors

The UAV corridors could pose a significant impact to Alaska Airline's operation by restricting essential arrival and departure paths to Fairbanks International. Alaska Airlines opposes the development of these corridors due to the further restriction of access to Fairbanks International.

BOX 68900 SEATTLE, WA 98168-0900/206-433-3200

N0043

Consideration of Future Airspace and Procedure Enhancements

Significant FAA and Industry resources have been deployed to complete several RNAV Optimized Profile Descents, RNAV Departure Procedures, and RNAV (RNP) Approach Procedures at FAI – all scheduled for full implementation in September, 2012. These new procedures are necessary to ensure efficient operations for all capable users and align with the FAA's NextGen initiative. Alaska Airlines feels it is essential that these arrival and departure tracks be considered in the EIS study in effort to aid in impact analysis and developing mitigation strategies.

Missile Live Fire For AIM-9 And AIM-120 In The Gulf Of Alaska

Alaska Airlines transits the Gulf of Alaska between the Hawaiian Islands and Anchorage and the Lower 48 States and Anchorage. As we have recently started to take advantage of more direct over-water routing between the lower 48 and Anchorage, the Draft EIS does not directly address the impact that this proposal has on existing Gulf of Alaska traffic. The EIS must include this information in order to fully analyze the impact of the proposal.

Cumulative Impacts

The cumulative impacts of adding further restrictions to airspace that is already limited by MOAs and ATCAAs in the State of Alaska needs to be identified and addressed by providing data on both direct and indirect impacts. Other elements of the JPARC, such as Stony, Naknek, Susitna, and Galena need to be evaluated in conjunction with the JPARC expansion EIS and determine if they are still necessary to meet modern training needs. Because Alaska provides "the largest available land, air and sea training in the world", expansion of JPARC should identify ways to offset impacts of other current military airspace. Evaluating the JPARC Expansion proposal independently of existing military airspace does not allow for consideration of the cumulative impacts to civil airspace users throughout the State of Alaska.

Thank you for considering our comments on the Draft EIS for the Joint Pacific Alaska Range Complex. Alaska Airlines supports the United States military and their need to train realistically. We look forward to close collaboration with the FAA, DoD, and other system users to support this need while ensuring an equitable solution for all users of the NAS.

Sincerely,



Steve Baker
Senior ATC Support Specialist
Alaska Airlines

N0044

From: Janeen Hutchins [REDACTED]
Sent: Monday, July 09, 2012 6:44 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: JPARC EIS Comments_NOLS_7.9.12.pdf

Please find attached comments on the JPARC EIS by the National Outdoor Leadership School.

Sincerely,
Janeen

Janeen Hutchins
Alaska Director
National Outdoor Leadership School
5805 N. Farm Loop Rd. Palmer, AK 99645 907.745.4047
janeen_hutchins@nols.edu

N0044



National Outdoor Leadership School

NOLS Alaska

PO Box 981

Palmer, Alaska 99645-0981

907-745-4047 Fax 907-745-6069

The Leader In Wilderness Education

July 9, 2012

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

Re: Comments on the JPARC EIS by the National Outdoor Leadership School

To Whom It May Concern:

The National Outdoor Leadership School appreciates this opportunity to provide comments during the public comment stage of the Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). As an outfitter running extended backcountry expeditions throughout the state of Alaska, we closely follow proposed projects that have the potential to affect the wilderness experience that our students expect.

NOLS has been operating in Alaska since the school established its base near Palmer in 1971. Since then, thousands of students have experienced the world-class wilderness opportunities available across this vast state through backpacking, sea kayaking, and mountaineering opportunities provided through our school.

The Talkeetnas in particular are a core destination for NOLS backpacking and mountaineering courses. With a strong wilderness feel, a quiet setting, good wildlife viewing opportunities, and a close proximity to NOLS Alaska, these mountains are an excellent fit for our program. Each year, NOLS runs 10-15 courses in the area, totaling approximately 5,000 user days. Our season runs from mid-May through mid-August. Other operators value the Talkeetnas as an operating area as well, including Alaska Pacific University. Furthermore, the area is very popular during hunting season, especially in August and September, and many local guides bring clients to the area to harvest from the big game populations found there.

The existing Fox 3 Military Operations Area (MOA) overlays a major portion of our operations in the Talkeetnas. At current use levels, and with the existing flight boundary at 5,000 feet above ground level (AGL), military exercises do not significantly impact our courses. It is not uncommon for a course in the Talkeetnas to hear sonic booms multiple times on a course—a jarring experience for any wilderness traveler, and one that would only be amplified were the flight level boundary reduced to 500 feet.



N0044

Changes associated with the proposed actions, however, would negatively impact NOLS operations in the Talkeetnas. Specifically, aspects of the proposed Fox 3 MOA expansion and the proposed Paxton MOA will impede the quality of our courses, and may in fact impede our ability to support our courses with aircraft. The significant expansion in boundaries, the proposed lower floor boundary of 500 feet AGL, and the expectation of increased frequency of training exercises will combine to have a major impact on NOLS and other operators in the area.

The first and most obvious concern related to the JPARC EIS is that of a diminished wilderness experience for NOLS students due to the increased presence of frequent, low-flying aircraft, and the associated visual and aural impacts on both our courses and on the wildlife of the area. Such a dramatic change in the wilderness feel of the area would not only diminish the quality of the experience for students on wilderness courses, but would also discourage future potential students from enrolling, affecting our bottom line. Our clientele—most of whom come from outside Alaska and seek out our courses for a backcountry adventure in The Last Frontier—anticipate natural quiet, an absence of human impact, and abundant wildlife.

Beyond big game like moose, caribou, Dall's sheep, and brown bear, the Talkeetnas are a thriving habitat for birds, including ducks, geese, trumpeter swans, and golden and bald eagles. Wolverines also call the area home. Though on-the-ground impacts of the project may be minimal, significant adverse impacts on the flora and fauna have been identified (page 3-47). Even with mitigation efforts the biological resources of the area may see lasting damage. We appreciate the airspace modification to conduct supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL, whichever is higher, so as to reduce their aural impacts (page 3-50). We look forward to seeing a more detailed plan for monitoring effects of military training on select wildlife species (especially herd animals, waterfowl, and raptors) as described on page 3-51 in the final EIS. We would also welcome a detailed plan for monitoring the effects of military training on visitors to the area.

Secondly, there is a potential for complications with private flights, which are essential to an extended NOLS wilderness expedition in these mountains. Courses in the Talkeetnas are typically re-routed by bush plane, and if there is a medical emergency, airplanes or helicopters are often the best options for evacuation. In public meetings, there have been assurances that private flights could continue. However, "...Scoping and other informal indicators suggest that an increasing segment of this aviation community may elect to avoid an active MOA. This may create impacts if these pilots would cancel or delay their flights, or otherwise fly increased travel distances around an active MOA to avoid this active airspace..." (page 3-18). We look forward to an explicit plan for dealing with planned and emergency flights in the proposed Fox and Paxton MOA expansions.

N0044

As the final EIS is developed, we encourage planners to consider reducing the size of the Fox 3 and Paxton MOAs and to consider keeping the boundary at 5,000 feet AGL in popular backcountry zones. This is just one opportunity to mitigate and/or minimize the impacts on backcountry travelers.

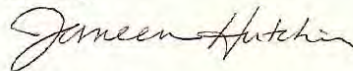
During scoping, we supported Alternative C, which included the Fox 3 MOA expansion (the proposed Fox 3,4,5, and 6 MOAs) without the low-altitude MOA. Though it was not clear at the time, we also asked that the proposed Paxton MOA also maintain a boundary of 5,000 feet AGL. If the Alaska Command requires a zone for low-altitude exercises, NOLS would be least impacted in the proposed Fox 6 MOA, and the southern half of the proposed Paxton MOA.

Because in the draft EIS only Alternatives A, E, and No Action are explored, we feel compelled to suggest a compromise. With adjustments as specified above, we could support a revised Alternative E. Though we recognize that the Alaskan Command is seeking to respond to public comment by amending the southern border of the Fox 3 MOA in Alternative E, this change will not reduce the impacts of the project on NOLS courses significantly enough for us to support this alternative. We anticipate that this alternative that would allow us to conduct our courses with few noticeable impacts if the adjustments specified above were adopted into Alternative E.

Lastly, we encourage the Alaskan Command to explore the possibility of alerting the public to upcoming exercises as described on page 3-17, preferably several weeks in advance. In the case of NOLS, this advanced notice would give us an opportunity to alert our courses in the field, and would give our instructors a chance to make any necessary preparations.

Thank you for your careful consideration of these comments. In a land as vast and untrammelled as Alaska, there should be room for everybody. If the concerns of all stakeholders are given careful consideration, and if the spirit of cooperation and balance is preserved in this JPARC EIS process, there is reasonable hope that we might reach an amicable compromise. Please do not hesitate to contact us with any further questions or concerns.

Sincerely,



Janeen Hutchins
NOLS Alaska Director
janeen_hutchins@nols.edu

N0045

[REDACTED]

From: Marleanna Hall [REDACTED]
Sent: Monday, July 09, 2012 6:46 PM
To: ALCOM J08 Admin Box
Subject: JPARC EIS Comments
Attachments: RDC JPARC EIS Comments.pdf

Good afternoon:

Please find a copy of RDC's comments attached, and please confirm receipt.

Thank you,
Marleanna

Marleanna Hall
Projects Coordinator
Resource Development Council for Alaska, Inc.
121 West Fireweed Lane, Suite 250
Anchorage, AK 99503
907-276-0700
<http://www.akrdc.org>

Growing Alaska Through Responsible Resource Development

N0045



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

Founded 1975
Executive Director
Rick Rogers
2012-2013 Executive Committee
Phil Cochran, President
L.F. "Len" Hunt, Sr. Vice President
Ralph Samuels, Vice President
Eric Fjelstad, Treasurer
Lorna Shaw, Secretary
Tom Maloney, Past President
Directors
Bob Berto
Patty Bielawski
Pat Carter
Steve Denton
Ella Ede
Stan Roo
Paul Glavrovich
Bill Jeffries
Scott Jepsen
Wendy Lindsaog
Lance Miller
Kam Moriarty
Dale Pittman
Bhan Schutt
John Shively
Jeanine St. John
Scott Thorson
Cam Toohy
Directors
Todd Abbott
Greg Baker
John Barnes
Dave Benton
Jason Berghon
Allen Bingham
Rick Boyles
Dave Chaput
Steve Connolly
Bob Cox
Dave Cruz
Allan Delany
Paula Esley
Brad Evans
Corni Feige
Jeff Foley
Carol Fraser
Tim Gallagher
Ricky Gease
Matt Gill
Dan Graham
Chuck Greene
Scott Habberstad
Karl Hanneman
Rok Hams
Paul Heruy
Steve Hites
Larry Houde
Teresa Ionn
Mike Jungreis
Frank Kelly
Thomas Krzewinski
John Lau
Tom Lewis
Thomas Mack
John MacKinnon
Stephanie Madsen
Karen Mathias
Sam Mazzeo
Ron McPheters
James Mery
Denise Michels
Hans Neidig
Lisa Parker
Judy Patrick
Charlie Powers
Mike Satre
Keith Silver
Lorali Simon
John Surgeon
Michael Ternand
Jan Trigg
Ex-Officio Members
Senator Mark Begich
Senator Lisa Murkowski
Congressman Don Young
Governor Sean Parnell

June 9, 2012

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

Via email to alcom.j08@elmendorf.af.mil

Re: Comments on Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement – Draft Environmental Impact Statement

To Whom It May Concern:

The Resource Development Council (RDC) is writing in response to the request for comments and information for the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (EIS).

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC submitted a letter March 3, 2011 explaining it recognized the importance of military training but is concerned that sufficient economic impact studies were not conducted prior to the release of the JPARC Modernization and Enhancement EIS. RDC urged the military to work with the Alaska Miners Association and other stakeholders (such as tourism) to develop an EIS that achieves maximum benefit for resource industries, public access, and military training needs. Overall, it does not appear these concerns were addressed.

Additionally, RDC requests mitigation measures be developed with stakeholders, to include:

- Prevention of mid-air collisions by developing a minimum altitude for military training aircraft;
- Improvement of radar and communications systems so that civilian stakeholders and military personnel operating in training areas are better informed;

121 West Fireweed Lane, Suite 250, Anchorage, Alaska 99503-2035
Phone: 907-276-0700 • Fax: 907-276-3887 • Email: resources@akrdc.org • Website: akrdc.org

N0045

- Reduce the Unmanned Vehicle Aircraft corridors to the minimum airspace needed, and mitigate use of these areas to reduce or eliminate the impact to resource development activities in the area;
- Consider making the most use of federal areas not designated for mineral resources, instead of lands with mining or other activities.

The potential economic impacts of the proposals in the EIS will likely be overly burdensome for not only large projects, but also for the “mom and pops” projects in the areas. RDC supports multiple-use of Alaska’s land, air, and resources, and advocates for increased access for resource and community development.

Thank you for the opportunity to comment on this important issue.

Sincerely,



Marleanna Hall
Projects Coordinator

N0046

[REDACTED]

From: Jane Dale [REDACTED]
Sent: Monday, July 09, 2012 10:03 PM
To: ALCOM J08 Admin Box
Subject: Alaska Airports Association JPARC Draft EIS Comments
Attachments: Alaska Airports Association JPARC Extension II - akaa final.pdf

Thank you for the opportunity to comment.

Jane Dale
Executive Director
Alaska Airports Association
[REDACTED]

N0046



Alaska Airports Association
P.O. Box 344
Willow, 99688

July 8, 2012

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

RE: JPARC Comments on Draft Environmental Impact Statement

The Alaska Airports Association (Akaa) is a non-profit organization dedicated to enhancing the operation and management of airports and back country landing areas within the State of Alaska. In addition, the goals of the Akaa are to support the needs and safety of aviation. Established in 2009, membership includes municipal and state airport operation managers, pilot groups, pilots, and aviation consultants. Our organization has over 100 members through individual and corporate memberships.

The US Department of Defense has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country, occupies some 65,000 square miles of airspace, in addition to significant holds of land, sea and an additional 42,000 nautical square miles of airspace on the Gulf of Alaska. A series of proposals are included in the draft Environmental Impact Statement that would further expand this complex. While we support military training, it is imperative that aviation safety and access be preserved for civil users of the regional complex area and for military personnel given the importance of aviation for basic transportation, goods and services, and medical resources in the state of Alaska.

Proposed Fox3 MOAs

The proposed expansion of the Fox 3 MOA is a significant increase in lateral extent, but also in vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This expansion is in direct conflict with areas that are frequently used by general aviation pilots and air taxi/transport operators to support hunting camps, mining operations, air tour operations, access recreational areas, homesteads, support ongoing Susitna-Wantana Hydroelectric Project related activity up to and including a proposed 7,000 ft IFR runway or make other uses of this region important to the economic benefit of Alaska.

N0046

Landing areas are dispersed throughout this proposed MOA on river bars, lakes, valleys, and ridges, in communities and in undeveloped areas where new airport facilities will be needed to support future projects such as the Susitna-Wantana hydroelectric project. Due to its proximity to the largest population center in Alaska, this proposed expansion will result in an increased collision potential between high-speed military aircraft executing low level training maneuvers on MOA airspace and civilian aviation. The Draft Environmental Impact Statement did not clearly identify why this area is necessary for use or why other existing MOA's are not available. In addition, mitigations for the proposals were not clearly identified. Additional work should be completed prior to expansion or creation of new MOA's.

The Special Use Airspace Information Service (SUAIS) was created as a result of the mid-1990's expansion of the MOAs. The existing SUAIS around FAIRBANKS has been plagued with communication issues. Two of the repeater sites have been out of service for extended periods of time with one recently planned to be replaced. In a heavily used area just outside of Black Rapids, near the West Fork of the Little Delta it has been difficult to make radio contact. This is not an uncommon complaint by pilots landing and departing along the river in the area. If the existing SUAIS is poorly maintained and insufficient in numerous areas, how will expansion of the same provide for public safety? This area is extremely important for camping, mining, subsistence, hydroelectric projects, and hunting which are important to the economic benefit of Alaska.

Recommendation 1: 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, especially while landing and departing airports, back country airfields, lakes, airstrips and ridges 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. In addition, real time IFR access should be provided to IFR traffic when the MOA is active.

Recommendation 2: 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 US Air Force Range Control during times the MOAs is in use. It is also essential that the tape recorded messages, broadcast during hours when Range Control is unmanned, and be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:

(a) Radio repeaters should be installed and operational before airspace is granted and in use. The repeaters should provide adequate coverage so aircraft can make contact and communicate with range control prior to entry into the special use airspace. The terrain in the proposed Fox MOA offers many different landing scenarios and communication in valleys and hillsides may be challenging.

N0046

- (b) Mitigations include raising the floor to the level where two way communication is available 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.

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 backcountry landing areas along with 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 specific single corridor which concentrates VFR traffic and increases the mid-air collision risk.

The Draft Environmental Impact Statement did not clearly identify why this area is necessary for use or why other existing MOA's are not available. In addition, mitigations for the proposals were not clearly identified. This work should be completed prior to creating the new MOA.

Recommendation 3: The proposed Paxson MOA, if considered, should be for high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation. Real time IFR access should be provided when the MOA is active.

IFR Access to MOA airspace

Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska; the trend is to continue modernization as funding resources become available. A corresponding private investment will be made by aircraft owners and facility owners to utilize these existing and proposed facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, excepting for emergency and lifeguard flights. Experience gained over recent years with the Delta MOA's, which overlays 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 and economic benefits for Alaskans. The loss of IFR access also impacts proposed projects such as the proposed 7,000 ft IFR runway to support the Susitna-Wantana Hydroelectric Project located within the boundaries of the proposed airspace and projects located outside of the boundaries of the proposed airspace.

N0046

Recommendation 4: No additional MOA airspace should be granted that interferes with IFR access until provisions are made to provide real-time IFR access through active MOAs or to an IFR instrument approach/departure associated with an airport facility. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities or facilities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system especially during IMC requiring IFR operations.

Proposed Battle Area Complex Restricted Area

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

Recommendation 5: The Alaska Airports Association supports the aviation community, to 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. We suggest the military seek other alternate means to allow their training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.

Proposed Restricted Areas for Realistic Live Ordinance Delivery (RLOD)

The proposals to establish restricted airspace for live ordinance 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 6: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. The Alaska Airports Association opposes connecting the two restricted areas making an overall barrier to access in this area of the State of Alaska.

Proposed Unmanned Aerial Vehicle Corridors

There is no doubt that unmanned aerial vehicles play an important role in today's military aviation and that training is required. UAV integration into the National Airspace System is currently a topic of discussion at the national level as these airships are expanded in aviation

N0046

usage alternatives. Restricting civil airspace to accommodate UAV transits next to the second largest airport hub in the state is a concern.

Recommendation 7: Corridors that are proposed would interfere with the safe and efficient access into Fairbanks International Airport and other local airports such as Chena Marina, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft, without utilizing restricted airspace, should be pursued.

Mitigation for Caribou/Sheep/Moose Season in the Alaska Range

While the Air Force already avoids scheduling of Major Force Exercises during September, December and January to avoid interference with sport and subsistence hunting, key areas under existing and proposed MOAs are heavily used for wildlife and sport fishing harvest. Military operations during these times should be avoided to ensure safety of civilian aircraft and avoid the potential for mid air collisions with low flying military operations.

Recommendation 8: Avoid the scheduling of Major Flying Exercises during the fall Moose, Sheep and Caribou hunting seasons and during times for subsistence harvests.

F-16 Relocation Proposal

While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson AFB in support of military training activities, to Joint Base Elmendorf Richardson (JBER) within the next year or so. It is also not clear what the impact of relocation of the F-16 squadron might have on airspace in and around the Susitna MOA and the corresponding civil public use facilities in Anchorage and the Matanuska Susitna Borough airports.

Recommendation 9: More analysis of this plan is required to understand the true impact on this development to allow informed public comment.

Evaluation of other Alaska MOAs

The draft EIS proposals focus on expansion of the airspaces. These MOAs and those located in other parts of the state are elements of the JPARC. The overall justification for the expansion of the FOX 3 and creation of the Paxson are for operation efficiencies however, there has been no published evaluation of the present uses of the Yukon, Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs or justify the expansion. No data was found in the Draft EIS on uses of these MOAs other than limited use data on the Stony MOA.

Recommendation 10: Provide an analysis of existing uses of the existing JPARC Complex including Yukon, Stony, Naknek, Susitna and Galena MOAs to establish their continued

N0046

need given the changes in training requirements, and need for operational efficiency described in the Draft EIS proposals.

The Alaska Airports Association respects the public comment process and appreciates the opportunity to provide recommendation, comments and input from airport operators and aviation professionals around the State of Alaska to support the safe and efficient use of the aviation transportation resources available.

Alaska Airports Association
chair@akairports.org
www.akairports.org
[907.495.6708](tel:907.495.6708)

N0047

[REDACTED]

From: Whitney Wolff [REDACTED]
Sent: Tuesday, July 10, 2012 12:17 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: JPARC FINAL w.doc

N0047



*Talkeetna Community
Council, Inc.*

A non-profit, community service organization

July 8, 2012

Comments Regarding the JPARC EIS
Specifically: Expanded FOX MOA and New PAXSON MOA

The Talkeetna Community Council, Inc. has studied the proposed JPARC Enhancement and Modernization EIS and has determined that the "NO ACTION ALTERNATIVE" is the only option which provides our community with the aviation safety, recreational opportunities and economic stability we currently enjoy. Neither Alternative A nor Alternative E offer relief from both lateral and vertical expansion which have been determined to cause significant adverse effects in the areas of Socio - Economics, Air Space Management/Flight Safety, Land Use - recreational / subsistence, and Noise from the proposed FOX MOA Expansion and the New Paxson MOA.

Of particular concern to our community is the proposed high/low flight sectors and the dropping of the operations floor to 500' AGL (above ground level). This dangerous drop in flight operations coupled with the inclusion of UAV (Unmanned Aerial Vehicle) corridors, constitutes a severe risk to Talkeetna's robust commercial and general aviation. This lowering of the minimum flight training altitude to 500 feet also compromises recreational use of the area and poses negative impacts to wildlife.

Many of our concerns have been cited in the Scoping Process and are included in Vol. 1, Chapter 3.0 Affected Environment and Environmental Consequences. 3.1 FOX MOA Expansion & New PAXSON MOA. The following are areas within the scope of the proposal that we have determined to be inadequately examined:

Air Space Management and Safety - Talkeetna hosts one of the busiest small airports in the state. The area of proposed expansion is a mountainous region presenting terrain challenges and limited flight corridors through passes. The increased safety risks from the expanded special use air space and lowering of the MOA floor, will potentially result in aircraft conflicts and crashes. Pilots flying VFR, may opt to avoid the MOA causing delays, route finding and fuel issues. It is particularly troublesome to some VFR (visual flight rules) pilots to be applying "see and avoid" skills in the vicinity of UAV's. Those operators instituting IFR (instrument flight rules) will be forced to seek

***Talkeetna Community Council, Inc.
P.O. Box 608, Talkeetna AK 99676***

N0047

alternate routes. The inclusion of the Richardson Highway corridor in the MOA will be a loss to aviators using it to safely navigate area terrain. Many small operators do not have the communication capabilities to utilize SUAIS (Special Use Airspace Information Service) and other mitigation tools proposed in the EIS.

Remote Airfields- Many Talkeetna businesses depend on civil and commercial aviation: hunting guides, fishing guides, hiking and adventure guides, rafting tours, and flightseeing operators. The JPARC EIS has determined that there will be significant impacts to civil aviation using airfields in the proposed areas. On page 3-11 of the above mentioned table 3-0, a list of airfields is included with a few lodges and lakes noted- it is extremely limited. The proposed expansion encompasses an area of the Talkeetna Mountains containing numerous additional airfields and popular lakes not noted. The expanded southern and western boundary includes the Iron Creek area, all of the Talkeetna Mountain glacial headwaters, the Sheep River and many other highly used areas for hunting, subsistence and recreation. The EIS suggests that "analysis should identify small landing strips and private airfields affected by the action, particularly those providing IFR services". This analysis has not been thoroughly conducted.

In conjunction with this weak analysis, TCCI has determined that the Impact Assessment Methodology does not adequately quantify general aviation use of the proposed areas. The JPARC EIS continually cites that civil aviation use is either unavailable from the FAA or "cannot be quantified". A cursory review of operators in the area shows no attempts by the JPARC to survey area aviators or contact local flight service operators for information regarding number of annual flight plans into the Talkeetna Mountains. A full survey of commercial and general aviation users of the area should be undertaken.

Impacts to Wildlife - The proposed expansion encompasses GMU 13 and GMU 20 which are some of the most productive and heavily used in the state. None of the proposed mitigation concepts in the EIS will completely protect area wildlife from the threats posed from supersonic noise and low level flight. TCCI is adamantly against the dropping of the MOA floor to 500 feet AGL. The 1997 Record of Decision (that followed the 1995 EIS) raised the proposed minimum flight altitude to it's current 5,000' due to impacts from noise. Scattering the Nelchina Caribou herd and impacting breeding and birthing of other mammals are just some of the many potential impacts to area wildlife. These impacts will have socio-economic and subsistence impacts on our community. TCCI supports the ADF&W working closely with JPARC to manage these sensitive resources.

***Talkeetna Community Council, Inc.
P.O. Box 608, Talkeetna AK 99676***

N0047

Recreational Impacts- The Talkeetna Mountains are a popular area for hunting, fishing, hiking and rafting - for both visitors and locals. The increased military presence will detract from the wilderness experience. Night operations will be particularly unappealing to campers. The proposed southern expansion will now include the upper sections of the Talkeetna River (the longest stretch of Class IV white water in North America) which is accessed by commercial air taxi's out of Talkeetna. Not only will transportation to the headwaters of the river be potentially compromised by inclusion in the MOA, but the combination of supersonic, low level flights, noise, and mock combat maneuvers could cause the type of anxiety many campers look forward to leaving behind in their urban homes.

Socio - Economic Impacts to Talkeetna - Many visitors to Talkeetna are lured to the area by the promise of abundant wildlife, pristine wild lands, clear air, and the quiet found in remote locations. These "intrinsic values" of our area support tourism, local businesses and wilderness outfitters. The JPARC Modernization and Enhancement contradicts these values. The quality of the Talkeetna Mountain hunting/recreational experience will be greatly reduced by these proposed actions, and will in turn have negative impacts on the local economy. Impacts to wildlife numbers coupled with the overall noise and military presence in the backcountry could easily lead a hunter to alternative venues in the state. Hikers and fishermen may have difficulty getting to their desired locations on small strips within the expanded area. Local air taxi's may have to charge higher rates due to re-routing or avoidance of MOA's. Compromised safety could exclude the once productive Talkeetna Mountains from many itineraries.

Cumulative Impacts - The EIS neglects to include cumulative impacts incurred with the proposed Susitna Watana Dam. The dam site is at Watana Creek in the heart of the expansion and will require excessive use of air support for many years of potential construction. The EIS also does not include current mining operations being surveyed by MMG/Alaska Earth Sciences. These surveys also require numerous air hours and air taxi transportation of personnel. The mining survey is south of the Denali Highway and consists of ground crews as well as aerial surveys.

Supersonic flights, UAV's, live munitions, strafing, dog fighting and all that this proposal encompasses has been seen by some area residents as a denial of their rights to a peaceful lifestyle. The proposed Expansion of the FOX MOA and addition of the Paxson MOA cover an area heavily used by Alaskans and tourists. TCCI supports the NO ACTION ALTERNATIVE and encourages JPARC to seek alternative locations for training which do not present such high levels of conflict with civilians and wildlife.

***Talkeetna Community Council, Inc.
P.O. Box 608, Talkeetna AK 99676***

N0048

From: Hannah Ragland [REDACTED]
Sent: Tuesday, July 10, 2012 1:20 AM
To: ALCOM J08 Admin Box
Subject: JPARC Draft EIS Comments
Attachments: DCC JPARC Draft EIS Comments 7-9-12.pdf

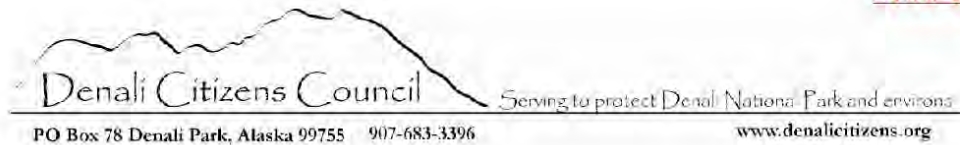
Attached are Denali Citizen Council's comments on the Joint Pacific Alaska Range Complex Modernization and Enhancement Draft EIS.

Thank you for the opportunity to comment.

Hannah Ragland

Board of Directors, Denali Citizens Council

N0048



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

To ALCOM Public Affairs,

The Denali Citizens Council (DCC) is a locally founded (1974), non-profit, grassroots community education and advocacy organization. We write to express concern about the proposed expansions outlined in the *JPARC Modernization and Enhancement Draft EIS*. We support the “No Action” alternatives, and have provided our concerns below. Denali Citizens Council (DCC) works to promote the natural integrity of Denali National Park and Preserve and foster responsible planning in the greater community. These expansions will affect lands within our area of concern, including several hundred square miles of land inside the Denali Borough, and airspace throughout the Borough, and over Denali National Park and Preserve. While our concerns do not end at these boundaries, our primary area of concern includes this land. Our board has heard from a number of members, and others within our communities. There have been a number of local meetings where residents have expressed concerns about the proposed training expansions. The Denali Borough Assembly passed a resolution in support of the “No Action” alternatives in 2011, and reasserted this opinion in 2012. The Middle Nenana Fish and Game Advisory Committee has done the same. Denali Citizens Council also supports the “No Action” alternatives due to the following concerns:

1. Much of the land and airspace included in the proposed expansions is used for travel by hunters and recreational users. Expanded land and airspace use, intensified use of existing areas, live ordnances, extended nighttime training hours, and lowered flight levels in these areas would greatly change their nature, and also raises safety concerns for those using the area.
 - a. The proposed expansion to the Fox MOA would relocate 1,250 overflights from the Stony MOA to the Fox MOA. We feel that dispersing use is more appropriate than concentrating use (even in a larger Fox MOA) and that the action would be inappropriate over the sensitive lands and valuable resources located below the airspace, especially considering the hazardous materials, noise, air quality, disturbance to wildlife, and human uses.
 - b. The addition of the Paxson MOA would more than double the amount of aircraft overflights across and around the Denali Highway region. As with the Fox MOA expansion, we feel that concentrating this type of aircraft use, rather than dispersing it, is too drastic to be appropriate. How did the need for an additional 11,000+ overflights arise so suddenly? Why is there a need for such a drastic expansion, rather than an incremental one?

DCC Board of Directors

Nancy Bale
Barbara Brease

Nan Eagleson
Charlie Loeb
JJ Neville

Hannah Ragland
Erica Watson
Jared Zimmerman

N0048

page 2

2. The areas these expansions would impact contain complex environments unique not only to the United States but to the entire world, not simply uninhabited terrain available for training. DCC is concerned about impacts to sensitive ecological factors, such as habitat quality, calving areas, rutting areas, sensitive aquatic areas, and migration routes for both mammals and birds.
3. The Draft EIS states “The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, surface water, air, and biological resources within and underlying the MOAs, such that no beneficial or adverse impacts would occur (page 3-37).” Considering the massive increase of debris from chaff and flares from increased airspace use through the proposal to expand MOA areas and operating hours (combined with identified future actions), deferring hazardous waste management to a later time is inadequate.
 - a. In approving any expansion of flights in this area, the plan must come to terms with the special use designations and high standards for habitat quality that support subsistence, sport hunting and fishing, and other recreation uses.
 - b. The EIS states that: “Depending on the chaff used, plastic or nylon pieces, a felt piece, or 2- by 3-inch squares of parchment paper can fall to the ground with each released chaff bundle.” It adds that: “The existing use of flares as defensive countermeasures results in small plastic, nylon, and aluminum-coated Mylar pieces falling to the ground.” The proposed addition to the hazardous waste (and non-hazardous garbage) littered on land below would be dramatically increased by this proposal and should not be allowed.
 - c. Chaff and flare should never be allowed during regular training and should never be allowed at altitudes lower than 5,000 feet AGL (or higher) to reduce impacts to wildlife (including wildfire potential in associated habitat), subsistence and other human uses.
 - d. The “flare safe & initiation (S&I) device” is garbage that is unaccounted for as increased litter and/or hazardous waste, and should be explained in the same areas as chaff and flares are.
4. If nighttime training hours must be changed to allow for changes to Daylight Savings, this change should only be for one hour, and should accordingly be one hour earlier in the morning departures. Requesting 2 or more hours of additional nighttime training in the evening, without changing morning departure would be solely for expansion of training opportunities (not continued activities) and should not be presented under the guise of accommodating for Daylight Saving time changes. Because this EIS bases most of the need for Night Joint Training on Daylight Saving time changes, it should be revised to fully disclose that this is not the case. We do not support changes to nighttime training hours unless it is only to accommodate the Daylight Saving time changes, thus only changing to one hour later in the evening, and one hour later in the morning.
 - a. Increased night joint training will increase the overall number of flights in the airspace above sensitive habitats, soundscapes and critical lands outlined above. For reasons stated elsewhere, this is not acceptable.
 - b. No increased night joint training should occur over or near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.

N0048

page 3

5. Many documented noise sensitive areas are located nearby and within existing and proposed MOAs. The Susitna MOA overlaps with Denali National Park and Preserve. DCC is concerned about the impacts increased Night Joint Training could have on the soundscapes in and adjacent to these noise sensitive areas, as well as the potential noise impacts to residents and others using the area.
 - a. Noise pollution over Denali National Park and Preserve and other noise sensitive areas must be maintained at current levels or reduced altogether. Additional noise pollution over noise sensitive areas should not be expanded. Stating that impacts will be “minimized” is inadequate.
 - b. The National Park Service has established standards for amount of noise disturbance consistent with park values in all areas of Denali, and we recommend you consult with NPS regarding the impact of the training expansion on these standards, and comply with their existing policies and standards.
 - c. The Draft EIS dismisses drastic increases to noise pollution as an “annoyance” to human users. Subsistence users and other consumptive and nonconsumptive wildlife users will be more than “annoyed” when wildlife is affected by noise, even if temporarily. Still, while “annoyed” may sometimes be an adequate description, the impacts would usually be much greater considering the increased intensity and abundance of overflights. This impact to humans and wildlife is exacerbated along with the increased noise from sonic booms and other maneuvering, as well as the scare factor (not necessarily quantifiable, but worth considering) of a low-altitude training or dry target maneuvers. These impacts should be given more weight in the consideration of cumulative impacts, and because of the impacts to these areas, training should not occur above or near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.
 - d. All training (including, but not limited to supersonic training) should be done in higher altitude over areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat.
6. What ground uses or closures would be implemented for dry target runs? The EIS claims there would be no changes to land use, yet refers to the use of “nonfunctional threat vehicles and trailers beneath MOA airspace approved by the Alaska Department of Transportation.” Are these dry targets located then along the Denali Highway? If they are located along the road they present additional safety and other human impacts and should not be increased or added to military training. No dry target should be located near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.
7. We believe that Table 3.9 only accounts for currently emitted air pollutants, and not permitted air pollutants. Permitted air pollutants (for example, the Healy Unit 2, currently not operating but predicted to in the near future) would cause a substantial increase in actual emissions. According the Alaska Regional Haze State Implementation Plan (regarding Healy Unit 2), “If brought on line, the point source NO_x emitted within the Denali Borough would increase by a factor of 4.0 and the Sox would increase by a factor of 2.8 (based on permitted not actual emissions). This increase would make the Denali Borough the largest sources of anthropogenic emissions and the second largest source of all emissions impacting the Denali monitors.” Aside from this, the fact that the Denali Borough currently has lower

N0049

From: [Lisa Herbert](#)
To: [ALCOM 108 Admin Box](#)
Subject: Fairbanks Chamber Comment Letter on DRAFT JPARC EIS
Date: Monday, July 09, 2012 6:20:46 PM
Attachments: [Fairbanks Chamber Comment Letter on DRAFT JPARC EIS.pdf](#)

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

Thank you,

Lisa Herbert | Executive Director | Greater Fairbanks Chamber of Commerce

[REDACTED] | www.FairbanksChamber.org

Like us on [Facebook](#) Today!



Interior Alaska – The “Place” To Do Business

100 Cushman St., Suite 102 | Fairbanks, Alaska 99701-4665
ph (907) 452-1105 | fax (907) 456-6968 | www.FairbanksChamber.org

N0049

July 9, 2012

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

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

Dear Sir,

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

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

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

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

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

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

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

INVESTORS

DIAMOND

BP Exploration
ConocoPhillips
ExxonMobil
Fairbanks Daily News-Miner
Fairbanks Memorial Hospital &
Denali Center
Flint Hills Resources Alaska
Mt. McKinley Bank
Santina's Flowers & Gifts

PLATINUM

Alaska Pipeline Service Co
Carlson Center
Doyon, Limited
Fred Meyer Stores
Golden Heart Utilities
Wells Fargo Bank Alaska

GOLD

Birchwood Homes
Denali State Bank
Design Alaska
Doyon Utilities LLC
First National Bank Alaska
GCI
Kinross-Fort Knox Mine
Lynden
MAC Federal Credit Union
Northrim Bank
Sumitomo Metal Mining Pogo LLC
Usbell Coal Mine

SILVER

ACS
Alaska Airlines
Alaska Railroad
Alaska USA
Dr. Christopher Henry – Henry
Orthodontics
Events Air Cargo, Events Air AK
Exclusive Paving/Univ. Red-Mix
Fairbanks Natural Gas
Flowline Alaska
Frontierhead Hotels
General Teamsters Local 969
GVEA
Hair & Associates, Inc.
JL Properties, Inc.
Key Bank
Personnel Plus
Shell Exploration & Production Co
Spirit of Alaska FCU
Tanana Valley Clinic
TDL Staffing
Tolmie Ocean Trawler Express, Inc.
Tower Hill Mines-Livingood Gold
Project
University of Alaska Fairbanks
Verizon Wireless
WAL-MART Stores, Inc.
Yukon Tide Company



N0049

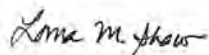
without a corresponding reduction in military restrictions and use of Alaska land and air space assets.

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

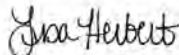
Thank you for the opportunity to offer comment on the *Draft JPARC EIS*. The Greater Fairbanks Chamber of Commerce looks forward to continuing a productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,

GREATER FAIRBANKS CHAMBER OF COMMERCE



Lorna Shaw
Board of Directors, Chair



Lisa Herbert
Executive Director



Steve Lundgren
Military Affairs, Chair

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

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

N0050



COPPER COUNTRY ALLIANCE

a 501(c)(3) non-profit corporation

"Protecting the rural and wild natural environment of the
Wrangell Mountains/Copper Basin region."

October 26, 2012

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

By email to alcom.j08@elmendorf.af.mil

Re: JPARC Modernization and Enhancement DEIS

Gentlemen:

Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. Many of our members have been disturbed, and even terrified, by low-flying Air Force jets, often creating sonic booms, in the Copper Basin and the adjoining Denali Highway region. They have been perplexed by the Air Force's lack of corrective action in the face of complaints that these aircraft were straying outside of the existing Fox 3, that they were below 5000 AGL, and that they were flying at supersonic speeds below 10,000 AGL, all in seeming violation of Fox 3 requirements. Finally, only last month, we learned of the existence of a Military Training Route (MTR #937) that crosses Fox 3 and goes beyond it, to cross the Gulkana Wild and Scenic River and the Richardson Highway, and that has a branch near Lake Louise and Nelchina.

The existence of these MTRs is difficult to discover in the *JPARC Modernization and Enhancement DEIS*. They are not listed in the Index. They are not described with reference to geographic features, such as Maclaren River; they have only numbers. Almost all maps omit them. (One would expect them to be shown on Figure 1-1, "Joint Pacific Alaska Range Complex Assets and Region of Influence," or Figure 1-4, "JPARC Master Plan Objectives," and a number of other maps.) I finally found them on Figure 4-1, which is 691 pages into the Volume I PDF, and on Figure D-2, page 365 of the Volume II PDF. Because their titles give no hint about MTRs, and because figures do not come up when using the Search function, it is easy to miss these maps in such long documents.

Likewise, their significance is almost indiscernible. Only if one happens upon Table D-4 (PDF page 368 of Volume II), does one discover that jets in MTRs can fly as low as 100 feet Above Ground Level. I still have not found within the DEIS the fact that jets may travel up to sonic speeds within MTRs, but such is the case, according to another Air Force document.¹

¹ "All routes would be capable of flight operations at up to sonic speeds, low altitude (as low as 100 feet above ground level [AGL], daylight or darkness, and in all weather conditions," per *Finding of No Significant Impact for Improvements to Military Training Routes in Alaska*, June 2006. The date of the Final EA to which the FONSI relates is repeatedly cited as 2007 instead of the correct 2006. This adds to the difficulty of learning about MTRs.

N0050

Finally, the DEIS fails to adequately consider MTRs with regard to cumulative impacts. In the cumulative impacts section, MTRs merely appear on a map (Figure 4-1) and on a table (Table 4.5), and an MTR document is listed on a table (Table 4.5). The document, cited as “*Modification of Military Training Routes (MTRs) Draft EA June 2005*,” is described thus on the table:

The Air Force is proposing to modify existing MTRs within the state of Alaska to better connect the MTRs with existing SUA. These changed MTRs would be used by aircraft with low level navigation missions. MFE training in the proposed Delta MOA includes low-level flight in the Birch and Buffalo MOAs.²

Cumulative impacts are crucial components of Environmental Impact Statements. The Environmental Protection Agency³ states:

The combined, incremental effects of human activity, referred to as cumulative impacts, pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources. Because federal projects cause or are affected by cumulative impacts, this type of impact must be assessed in documents prepared under the National Environmental Policy Act (NEPA).

Listing an MTR document on a table, (Table 4.5) does not constitute a meaningful assessment. The JPARC DEIS fails to discuss the interaction between the MTRs and the proposed new and expanded MOAs. And there are interactions. According to a long-time resident of Maclaren and Paxson, “The moose are on edge, our dogs in the kennel hide trembling in their houses and my three-year-old daughter is afraid to go outside when the jets are overhead; ‘Daddy, I’m scared of the jets.’” He adds, “Caribou will have a hard time; they are along the Denali mostly during the spring and summer months. Caribou are more flighty than moose. They tend to jump and run when startled; that is their defense mechanism.”⁴ The incidents referred to occurred within MTR #937, which is also within the existing Fox 3. If the Fox 3 expansion and Paxson MOA are added, that increases the area where wildlife, hunters, recreationists, and visitors are stressed by jets. If the floor is lowered to 500 AGL in the current and proposed MOAs, that greatly exacerbates the problem.

Copper Country Alliance requests that the Final JPARC DEIS give the reader a clear understanding of what jets do in MTRs, show them on maps at the beginning of the document, list them in the index, and give them the discussion they deserve in cumulative impacts. We do understand that the JPARC DEIS does not propose to change MTRs, but understanding them is essential to comprehending what is happening in the present and proposed MOAs within the region that is our home.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry, Volunteer Staff

² On the table, the timeframe for the Draft EA action is given as past and present, but not future. The Final EA is not listed on the table, even though it had been published almost six years before the JPARC DEIS was released.

³ *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*, EPA 315-R-99-002/May 1999.

⁴ John Schandelmeier, in his Sports Section article, *Anchorage Daily News*, July 31, 2012.

N.2.4 Individual Comments in Order by Identifier ID Number

I0001

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0001	George Davidson	self		Airspace Management, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	The expanded Fox MOA covers my private land, private cabin & private air strip. If you are insisting on doing this expanded Fox with the lower ceiling then buy me out as I am the only private inholding in this expanded Fox MOA. I have owned this property for 30 years and your proposal will destroy the peace and quiet that I spent considerable money on to acquire. The new airspace also deprives me of my ability to easily access my private property as my access would only be feasible during periods when the MOA was not active. My earlier comments (last time your requested comments) provided you with the Lat & Lon for my property. More generally I am on the Oshetna River about 1 mile down stream from the confluence of the Little Oshetna River. This put me squarely into the active (long axis) of Fox & Paxson MOA. Please provide me with some form of contact so that I know my comments have at least been read by someone involved with this project. Thanks! George Davidson An Alaskan

I0002

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0002	john smart			General (to the EIS), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	Will their be enhanced radio coverage to assist both military and civilian pilots in the lower levels of southern airspace? thanks john

I0003

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0003	Shawn Roberts			All proposed actions	38 1.5.1.6 Unmanned Aerial Vehicle Access A 12 1.5.1.1 Fox 3 Military Operations Area Expansion: As a pilot who utilizes a lot of area around Fairbanks I worry about more restrictions and larger control of existing airspace by the military. I have seen jets flying vertically through a hole in a large cloud near the Parks Highway south of Clear. I was not in an MOA at the time and wondered if he ever saw me and could avoid me if he did. I feel larger areas would just provide more of these excursions outside for GA. 32 1.5.1.12 Missile Live-Fire for AIM-9 and AIM-120 This concerns me due to the possibility of contamination to wildlife and water-shed in the area. What toxins would be left to leach out after large amounts of live ordnance in a concentrated area? 39 1.5.1.13 Low-Altitude Tactical Navigation Training: Having seen what low altitude jets have done in the wilderness I object to prolonged low altitude flights over wilderness. I have witnessed a birds nest blown out of a tree along with a large percussion to my chest with low flight and sonic booms. I believe pilots in the air over wilderness don't realize there is 'something down there' by the way they fly over it. They act as if the terrain is theirs to 'play with'. I have witnessed glass in my cabin break and saw a helmeted pilot zoom past with frost on the nose of his jet while low-flying along the Nowitna River. I do not see noisy low-flight in any way compatible with human or wild-life in Alaska's wilderness areas. Thank you..

I0004

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0004	Mike McQueen			General (to the EIS)	I have already attempted to submit comment via this Internet based system. Did you receive them?

I0005

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0005	Mike McQueen			General (to the EIS)	I have already attempted to submit comment via this Internet based system. Did you receive them?

10006

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10006	Mike McQueen			General (to the EIS), Noise, Biological Resources, Land Use, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>I realize that training is the key to having an effective military and I support training, training, training! However, some of the proposals for the expanded Fox 3 MOA and the new Paxon MOA will undoubtedly impact my use of the state and public lands in these areas. My wife and I fish, float, camp, hike and x-country ski in these areas each year. I am very concerned about the following areas: Gulkana River, Tangle Lakes, Delta River, Lake Louise, and Crosswind Lake. The Denali Hwy corridor is also of great concern to me. The noise of low level (500 ft AGL) jet flights will be more than startling in my estimate. If these occur at night the noise will be downright stunning. The size of the EIS (700 and some pages) combined with the detailed nature of the presentation makes comprehension of the proposed action, alternatives and impact analysis challenging. Since you stated the majority of the scoping concerns were directed at the two MOAs I suggest you present perhaps in table form a list of the actions proposed for these MOAs the pace of operations and comparisons to noise levels a normal person can relate to. What in the world does 100 or 62 db sound like? It was difficult to understand how many passes aircraft would be making over any given area and at what altitude during normal training, during MFEs major flight exercises and at night. Without some understanding of the numbers of aircraft the number of passes and the associated noise levels of each pass it is impossible to understand what the on the ground experience will be. Please describe to me what I will experience if I were standing on one of the ridges above Tangle Lakes or some other high use location during normal training, during major flight exercises and during joint night training. Please include the intensity of the noise, duration of the noise and how many repetitions may occur each hour and each day. Please relate the noise levels to something I can relate to, i.e. thunder clap, distant thunder, rifle shot, etc. It was unclear to me if 6 MFEs annually occurred for a total of 60 days or each MFE lasted for 60 days. I believe you have incorrectly dismissed the potential for the flares to start wildfires under the MOAs. Flight exercises at the Top Gun School at the Fallon Naval Air Station in Nevada have started a number of fires on BLM lands that required the initiation of suppression activities.</p>

10006

10006

I believe that the BLM office located in Carson City Nevada has documentation of these fires. I know that the end of a flare was identified at the origin of one fire. The climate, habitat, and potential for fire may be different here in Alaska but this issue should be investigated more thoroughly. I do agree that flares released at 5K feet should not reach the ground but they did in Nevada. Alaska Department of Fish and Game currently conducts or at least sponsors aerial shooting of wolves in Game Management Unit 13 that I believe is under a large portion of the Fox 3 MOA. ADFG recently reports that these numbers have been reduced from around 500 animals to around 150 animals. The remaining wolves may be more sensitive to low level flight noise than populations of wolves that are not hunted from airplanes. I suggest the military support ADFG in studies or at least observations of wolves and other animals of interest such as caribou, moose, migratory waterfowl and other birds responses to the sounds and sights generated by low level jet flights in these MOAs. I suggest the following: 1. The military agrees to pay for all suppression activities related to fires started by military operations. 2. Avoid low level jet flights (day or night) over known high use areas such Lake Louise, Tangle Lakes, Delta River, Gulkana River. And campgrounds along the Denali Hwy. 3. Select an alternative that minimizes noise impacts on high use areas. 4. Select an alternative that excludes high use areas from the MOAs.

5 Adopt an adaptive management strategy that will reduce noise impacts on large ungulates, predators and large migratory birds if they are found to respond adversely to low level jet flights or other aspects of military operations. 6. Low level jet flights will not be conducted parallel to or directly over high use river corridors such as the Delta River, Gulkana River etc. Low level jet flights, when absolutely necessary, should cross these high use corridors at angles approaching perpendicular. This should also be applied to the Denali Hwy. Thank You,

Mike McQueen

I0007

[REDACTED]

From: Don Garrett [REDACTED]
Sent: Saturday, April 07, 2012 7:04 PM
To: ALCOM J08 Admin Box
Subject: EIS area

I have never seen a reason for the military to need the use of 1/3 of Alaska for their exercises. I have live here for more than 50 years and had interference of my hunting and fishing areas of a great deal of Alaska by military aircraft and other vehicles. There is enough area already designated for you to use and you need no more.

Don Garrett
[REDACTED]

10008

From: Karl Monetti [REDACTED]
Sent: Monday, April 09, 2012 1:40 AM
To: ALCOM J08 Admin Box
Subject: JPARC

I am writing to express my concerns over the proceed expansion of military fly zones.

Much of the area the expansion will cover includes settlements, lodges, subsistence areas, and recreation areas such as Paxson and Meiers Lakes, Sourdough, Maclaren, Lake Louise, and the Tangle Lakes/Delta Wild and Scenic River system, as well as most of the Denali Highway. Most people who live in rural areas do so in part to escape the stresses, including noise, of more settled areas. They forsake many conveniences—water and sewer service, supermarkets, hospitals—in order to do so. Alaska's rural and backcountry areas should provide an alternative to city and suburban life, for locals as well as visitors. Visitors (tourists) expect nothing less. Many of them spend their lives dreaming of the Alaskan adventure; having that dream shattered by low flying military aircraft all hours of the day or night, almost anywhere they choose to travel in the state, is unacceptable.

JPARC is already huge. It takes up a great swath of Alaska. We believe that our Armed Forces are fully capable of finding ways to perform their necessary training within the present 65,000 square miles. On a personal note, I live 3 miles southwest of the Eielson AFB runway, in the Eielson Farm Road. Eielson AFB owns thousands of acres of land to the northeast of the runway; why is it that the touch and go practice is always conducted over populated areas like the Eielson Farm Road instead of over the unpopulated lands the base already owns? This question has direct bearing on the proposed expansion; if current military practice does not take into consideration the peace and quiet of current residents, why should we believe any attempts to minimize noise/nuisance would occur over vastly expanded land areas in the future?

Past personal experience tells me that AGLs and sonic boom restrictions will be violated. For instance, I have had at several such experiences in the Tanana Flats Training Area. I live on the flight path between EAFB and Blair Lakes bombing range. Numerous times I have had low flying (less than 500 feet AGL) come right over my house, just barely above tree-top level. Worse than that nuisance and noise is the fact that they also fly right over my personal runway; if a plane were taking off from this runway when a violating chopper went over, disastrous consequences could arise.

Sonic booms aside, the noise and sight of jet aircraft at 500 AGL is unacceptable. The proposed extension covers thousand of square miles of prime hunting and flight-seeing lands, where dozens of light aircraft are to be found fling at similarly low levels AGL on a daily basis. Having high speed military aircraft mixing with these light aircraft is unsafe. Existing restricted areas already provide thousands of square miles of land over which aircraft can practice low level high speed flight and maneuvers.

High noise levels at night are even worse than in daylight. **Night flying time should not be extended!**

Wildlife is likely to be stressed by the low flights, with or without sonic booms.

EIS Should Include:

1. All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1.
2. All alternatives should include more and continued publicity about the number that people should call to report sonic booms and violations of prescribed flight levels and training area boundaries. Publicity should include what types of information people should be prepared to provide. Consideration must be given to the fact that a few days may elapse before people can make the report. Some of us do not carry cell phones, and even if we did, cell phone coverage in the FOX areas is spotty.
3. It is important to understand how dozens of species of birds and mammals are affected by low level flights and sonic booms. This information is not readily available for most species, because Alaska's wildlife managers, operating on

I0008

restricted budgets, tend to concentrate their research on those species most used by humans. Anecdotal reports alone cannot be relied on; they lack rigor, and they often conflict. Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika. The military should contract with independent scientists, possibly at the University of Alaska, to undertake research.

4. What is the possibility of an avalanche being triggered by a sonic boom? The proposed Paxson MOA includes popular winter climbing, backcountry skiing, and snowmachining areas.

5. Low level flights over areas where birds are concentrated could be hazardous to both birds and airplanes. For instance, large flocks of ducks and a number of swans utilize a series of lakes around mile 48 to 50 of the Denali Highway, in the existing FOX 3 MOA. The tragic, fatal collision of a jet with geese at Elmendorf illustrates this hazard. A similar hazard would exist during migrations.

6. Household subsistence studies, now twenty years old, should be updated to give a current picture of current consumptive uses of wildlife. The National Park Service has been able to research only a few communities so far.

Thank you for your consideration.

Karl Monetti

[REDACTED]

[REDACTED]

I0009

From: Lee Mortimer [REDACTED]
Sent: Saturday, April 14, 2012 7:52 PM
To: ALCOM J08 Admin Box
Subject: Copper River MOA Expansion

You're hereby invited to come sit on my deck above the Copper River, watch the bald eagles soar, see the bears down on the river--and then hold your ears as one of your Hercs or Apaches blasts up the Canyon level with the river bluffs. Your fly guys don't play by the existing rules--and you seriously want to give them a bigger playpen? I've experienced the same flagrant disregard for MOA rules at Mountain Home ID AFB and Davis-Monthan AFB in Tucson. Might be better to enforce the existing rules before you seek to expand your turf. Lee R. Mortimer, MP [REDACTED]

I0010

From: Dianne Herman [REDACTED]
Sent: Thursday, May 17, 2012 12:36 AM
To: ALCOM J08 Admin Box
Subject: JPARC expansion

I attended the last session JPARC had in Healy, and, because nothing much seems to have change, I won't be attending the one on May 21st. I agree with the attendee in Palmer who told you that it is an outrage that the military is taking over Alaska's playground, turning it into a war game zone, which will make it extremely inhospitable to the Alaskans who have been recreating there for many years (not to mention the native Alaskans who have been hunting there for time immemorial). Most of the military war-gamers will likely be kids from the lower 48, who have no love or care for our Alaskan land, environment, plants, and animals. This is not ethical!!!

As a long time Alaskan, 67 years of age, who has lived all over the state, I have seen the devastation caused by the military taking over Alaskan terrain (Long Island off of Kodiak town, for example). There are old, rusting, polluting oil drums all over the tundra, in many villages where I have taught, remnants of the military presence. As an avid environmentalist, I am aware of other places that the U.S. military has ruined with their war games, such as Makua in Hawaii.

I am adamantly OPPOSED to any additional military presence in Alaska! Please take your war games and weapons and polluting, expensive aircraft elsewhere. Keep them on the bases already established in the lower 48.

Sincerely, Dianne Herman, [REDACTED]

I0011

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0011	Mark Bartlett	Mr.	N/A	General (to the EIS)	I am all in favor of training areas that will be used by Our Armed Forces to keep finely honed on specialized warfare. I do not, however, give them Carte Blanche to BLOCK ME OR MY FAMILY OUT FROM THESE recreational areas. My Family and I are willing to share—not take over so we can never enjoy these remote areas. However you need to do that—scheduling or notifications or whatever. Regards, Mark A. Bartlett Jane L. Bartlett

I0012

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0012	dave sullivan			General (to the EIS), Airspace Management, Safety (Airspace), Subsistence, All proposed actions	The Talkeetna Mountain, Nelchina Basin should not be used for extensive military training as it is a high use recreational area. Use areas over National Parks, etc. as the recreational use is restricted there. Sincerely, Dave Sullivan

I0013

Alaska Airman's Association
[REDACTED]

4-21-12

Dear Sir,

RE: JPARC

The Joint Pacific Alaska Range Complex Modernization and Enhancement of Ranges and Training Areas program has recently released an Executive Summary. I have spent 2 ½ hours trying to understand the changes that might affect me and am baffled.

Rather than the military saying "HERE IS WHAT WE ARE GOING TO DO, WATCH OUT!" They really need to identify the 24-7-365 **SAFE CORRIDOR** for General Aviation Aircraft flying from Tok to Fairbanks. I'm sure pilots in other communities would express a desire for similar **SAFE CORRIDOR** routes in their areas.

On the afternoon of 4-18-12 a rogue military 4 engine turbo-prop buzzed over Tok several times @ 4-5 hundred feet above ground level! This scared the be-jeebers out of me... Approximately one hour earlier I had returned from a General Aviation flight at that same altitude and same location. My little Super Cub wouldn't stand a chance avoiding an Orion - Hercules size 4 engine military aircraft flying at 200+ mph. The prop wash and wing tip vortices would roll me right out of the sky... provided that we missed a collision in the first place. This kind of flying is going to kill someone. Yet, with the proposed ceilings and floors of the JPARC this is exactly the kind of flying situation that is being set up.

Please take whatever steps are available to require establishment of 24-7-365 **SAFE CORRIDORS** along General Aviation routes.

REMEMBER: IT'S OUR SKY TOO!!

David Parker (AAA #8576)

David Parker
[REDACTED]

cc:

Governor Sean Parnell
[REDACTED]

Representative Don Young
[REDACTED]

Senator Lisa Murkowski
[REDACTED]

Alcom Public Affairs
[REDACTED]

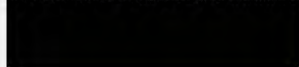
I0013

2

Representative Alan Dick



Representative Dan Saddler
Joint Armed Services Committee



AOPA

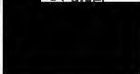
Tom George



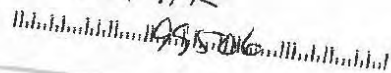
Fairbanks Flight Standards
District Office



David Parker



ALCOM Public Affairs
9480 PEASE AVE
SUITE 120
JBER, AK



I0014

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0014	Deborah Kalakis	Member	The Lake Louise Phoenix	Land Use	As a property holder of nearly 20 years, I respectfully request that all of the Lake Louise, Susitna, and Tyone Lakes be excluded from Alternative E of the Joint Alaska Pacific Range Complex Modernization and Enhancement Environmental Impact Statement (statement). I further respectfully request that there be no action alternative of the proposals within Alternative E of the statement. Sincerely, Deborah A. Kalakis aka Deborah A. Holmes The Lake Louise Phoenix, LLC.

I0015

45

[REDACTED]

19 COLONEL ORR: Next we'll have comments from Mr. Terry
20 Carter (sic).

21 MR. CARTEE: Cartee.

22 COLONEL ORR: Cartee?

23 MR. CARTEE: Yes.

24 COLONEL ORR: Apologize.

25 MR. CARTEE: First I'd like to clarify that the MOA only

[REDACTED]

I0015

46

1 separates the military traffic from the IFR traffic. VFR
2 traffic can fly in the MOAs unrestricted.

3 I've been out in the MOAs during hunting season and had
4 sonic booms, I've had airplanes come over me at 250 feet or
5 less, and I feel the Paxon addition at 500 feet AGL in a major
6 corridor, VFR corridor, between Gulkana and Greely, Fairbanks,
7 is a hazard and a major safety hazard to light airplanes and to
8 the military aircraft using it. At 250 knots they have no
9 reaction time at that altitude and a lot of the VFR traffic do
10 not have transponders so they will not be able to see them.

11 And the lowering of the Fox 3 from 5,000 feet down to 500
12 over a major hunting and recreational area is another major
13 safety hazard as that is altitudes that all the light planes use
14 from about surface to about 5,000, 3,000 feet. So lowering it
15 from 5,000 down to 500 feet is just asking for an accident to
16 happen. And that's all I have.

17 UNIDENTIFIED MALE: Thank you, Mr. Cartee.

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

[REDACTED]

I0016

47

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

4 MR. KENDALL: Mr. Orr. Mr. Orr, name is Paul, middle
5 initial D, Kendall. I'm from Alaska and I came to your meeting
6 tonight to kind of wedge something in because I'm not articulate
7 and learned enough to really understand the EIS like some of the
8 professional members of my community.

9 I'm an energy activist. This is a business card I'd like
10 to give into the record and also a list of links and these links
11 represent a new energy design that is now expected to come
12 online within the next six to 18 months. Most of you know it as
13 cold fusion. What, should I just hand this to somebody or....

14 UNIDENTIFIED MALE: Yes.

15 MR. KENDALL: Oh, all right. You'll be looking at
16 something called an E cat, energy catalyzer, by Mr. Rossi and
17 they're getting what they call COP, coefficients of performance
18 or production. They're six to 30 times the energy out that they
19 put in. They're suggesting that these units can run for six
20 months under temperatures of 1,500 degrees Celsius on five grams
21 of hydrogen and about 55 grams of nickel and they produce zero
22 pollution. They can also drive a five KW electrical unit at the
23 same time. Scientists are now talking the time has come to
24 where oil pipelines, there's no need for those or power lines.
25 They're talking about energy that can be looped. When you can

[REDACTED]

I0016

48

1 loop energy it's infinite. And if that weren't enough, another
2 competitor came out with a 45 KW unit which will run for a year
3 and a half on a limited amount of hydrogen and nickel. And if
4 that weren't enough, last week a company by the name of
5 Brillovin, which you can find on pesn.com out of Berkeley,
6 proposes that they have found a frequency which separates these
7 subatomic particles and you can run a boiler in Nome, Alaska for
8 three years on a quart of water. And if you bring that same
9 boiler -- and that's with no gas lines attached to it. And if
10 you bring that same boiler to Berkley you can run it for 20
11 years,

12 And the reason I bring this to you folks tonight is that
13 we have a coal fire power plant in Healy. They're about to fire
14 that plant up on coal and I would think with your funding and
15 your leading edge technology as defenders of which there's a DIA
16 document on that list which refers to this as the greatest
17 potential transformation of the U.S. battlefield forces since
18 the change from horses to gasoline. I would suggest that you
19 intervene as quickly as you can and go into that coal fire power
20 plant with these units which produce tremendous amounts of
21 energy when hooked in sequence. And if that weren't enough, we
22 think the U.S. Navy has purchased one of these small shipping
23 containers that can generate about 15 to 30 KW in electricity.
24 Once it kicks itself off it makes its own energy.

25 And I realize some of these things sound preposterous, but



I0016

49

1 the chief scientist at NASA has weighed in on this. Stanford
2 Research Institute has validated some of the tests, Los Alamos
3 Laboratories. Some of the most renowned names around the world
4 are now coming online with this, including the Royal Society of
5 Swedish People out of Switzerland, and even they made the
6 comment that Mr. Rossi is credible. There are now six companies
7 vying to come online with a residential unit within the next six
8 to 18 months. And the Swedish scientist said they don't -- the
9 design is credible, they had a big press conference, but they
10 don't understand what it's doing, how it's doing or anybody that
11 does. This is something transformational, what we call, it's
12 almost a metamorphosis of this society. They think they will
13 move through a world production covering the market within three
14 years at the max 25 percent of the world houses with these
15 devices. They are suggesting the military and the DIA document,
16 they're referring to this as disruptive technology. They're
17 saying that this has up to 10 million times the energy per unit
18 of chemical mass of anything we're using on the planet today.

19 I have never seen anything unfolding quite like this in my
20 lifetime. I do think it has a tremendous amount of credibility,
21 but you should see the scientists arguing. You have a chance
22 here with your military operation to be a part of our community
23 to help build that new society almost overnight in a great and
24 wondrous land with many challenges and I think it could play a
25 historical role. And you can't -- surely can't let the Navy get

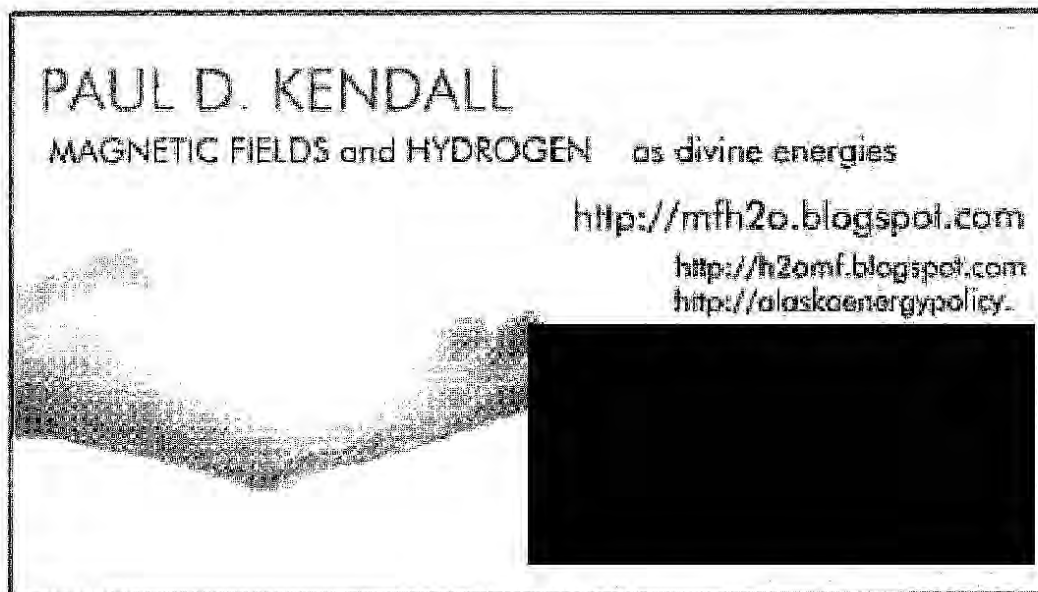


2 And thank you very much.

[illegible]

— 248 —

I0016



I0016

Date: 4-25-12 LINKS PAGE (local cell for now 907-222-7882 -- see below)

To: Citizens of Alaska

Ladies and Gentlemen,

Our Alaska Newspapers, most Talk Radio, Other Media Platforms, Schools, Utilities, Oil Producers, Community and Political Leaders **WILL NOT PUBLISH or PUBLICLY TALK** about the Energy Documents Sites below. (I have standing challenges to have a public discussion and they will not)

Thank You, If you have any questions, please call or contact me.

Paul D. Kendall

(Energy in Harmony activist, researcher, commentator and consultant)

You tube / Google

#1 E-CAT Cold Fusion (ROSSI REACTOR)

<http://ecat.com/> http://pesn.com/2012/04/19/9602076_LENr-to-Market_Weekly_April-19/

<http://www.youtube.com/watch?v=R1CTvUuy4k> <http://www.defkalion-energy.com/>

<http://coldfusionnow.org/> <http://ecatnews.com/> <http://www.scoop.int/t/rossi-s-ecat.com>

(Residential and Commercial Cold Fusion Units launching late 2012 / 13. Scientist are discussing this as a potential World Changing Event - nearly unlimited clean energy - a small nuclear fusion furnace in every dwelling on the planet) <http://www.e-catworld.com/>

Google

#2 DIA-08-0911-003 (A MUST READ - WOW !)

<http://en.wikipedia.org/wiki/File:2009DIA-08-0911-003.pdf>

(Unclassified Defense Intelligence Agency 8 page report on LENR low energy nuclear reactions - COLD FUSION - Paradigm Shifting Results - possible 10 millions times the chemical energy per units used today)

Google

#3 LoU-fuelcell-cars.pdf (DAIMLER test.pdf) (Hydrogen Economy Launched)

<http://www.hydrogenlink.net/download/LoU-fuelcell-cars.pdf>

(7 biggest auto mfg launching Elec Vehicles, Fuel Cell, Compressed Air, Hydrogen & they want the HYDROGEN HWY in place by 2015)

#4 People wanting to sign up for an **E-CAT, HYPERION - other HOME OR BUSINESS**

REACTOR UNIT when available in late 2012 - 13...contact <http://www.e-cat.com/> or

<http://www.leonardo.com/> <http://www.defkalion-energy.com/>

<http://www.brillouinenergy.com/> www.pesn.com

ALSO CHECK OUT

5 <http://www.pluginamerica.org/vehicles/all> (list of electric and fuel cell vehicles)

In closing,

We have begun the "Voice Recognition", "Home Cold Fusion Reactor Evolution",

"Hydrogen Economy Infrastructure", "hydrogen generation at will" , and

"Electrifying up the Planet" using many new technologies that are now coming forward in residential, transportation and commercial sector designs and devices;

Its all about Individual Clean Energy; Period !..

Our leaders fear this new "Energy in Harmony" Age because it brings us true individual freedoms, true free markets, and real individual accountability.

END -- thanks, [REDACTED]

<http://mfh2o.blogspot.com> see [FINAL_DRAFT_23.pdf](#) and Alaska River Ocean Energy Ideas

I0017

50

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

8 MR. KENDALL: Well, I'm not sure when I've had the
9 opportunity to do this before in my lifetime. I've been in lots
10 of places here, but I am going to seize the opportunity.

11 I think that you need to understand something, ladies and
12 gentlemen, and this is why this is very important. Our society
13 is founded on energy. And in regards to this EIS I have to tie
14 this into here if you'll give me a moment to construct this, but
15 even though the EIS looks to find harmony and your society is
16 chasing money, but there isn't a creature in the universe that
17 eats the money. It's all an after energy moment and I think
18 that it is imperative that you add the energy consideration in
19 this EIS. And when you look at the constructs of that energy
20 you will find that most of it, if not all of it, is hydrogen
21 based.

22 So I'm trying to wedge something in here as best I can in
23 your EIS. It would seem to me the fact that you don't have this
24 included in your EIS is a profound statement about the lack of
25 connection in a properly formed society. And to make an example

[REDACTED]

I0017

51

1 of that so that you understand the relevance of that, your
2 children do not drink a glass of water. That is an ancient
3 term, it is a primordial term, it is a tricked up term or a
4 sling term. You drink hydrogen and oxygen and when you drink
5 that your body makes electricity, it fires you up. You come
6 online, onboard with synaptic impulses and then you hunt carbon
7 to form frame and hair and infrastructure. And when you begin
8 to realize that you begin to realize the connection. There's no
9 such thing as gasoline. It's hydrogen, pop and carbon. There's
10 no such thing as diesel. It's hydrogen, pop and carbon.
11 There's no such thing as jet fuel. It's hydrogen, pop and
12 carbon. Every creature out there in the universe, ladies and
13 gentlemen, is a transportation system that is specialized in
14 this design. All of those designs are fired by hydrogen living
15 in harmony with its hydrogen. And for you to have an EIS
16 without a hydrogen reference point to the impact of all those
17 things. Anything that's consuming hydrogen, generating a
18 current and altering its mass most likely has a state of being
19 of which we have not recognized in our evolution yet. But when
20 this new cold fusion comes online you're going to find whole new
21 economies and the reason you will is they will not be able to
22 use fuel to be able to give foundation to the dollar. And if
23 you have energy you can tool up, tech up, light up, arm up,
24 transport, communicate, grow food, you are a creature with a new
25 mindset and a new set of priorities and that will evolve your

