

Comments and Responses

This chapter includes the comments submitted to the Army on the Draft Environmental Impact Statement (EIS) and presents the Army's responses to those comments. The Army prepared the Draft EIS in accordance with the Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act (NEPA) (Title 40 of the Code of Federal Regulations [CFR] Part 1500-1508) and the Army's NEPA-implementing regulations (32 CFR 651). These procedures and regulations provide for a period of public comment on a Draft EIS prior to the publication of a Final EIS.

Section 1.8 of this Final EIS provides a summary of the public involvement process completed throughout the EIS preparation, including public involvement during scoping, notice to the public and review of the Draft EIS, the Army's publication of this Final EIS, and the Army's plan to document its decision in a Record of Decision.

During the public comment period, 18 individual comment letters, e-mails, or comment forms and four meeting transcripts representing a total of 98 individual comments relevant to the Draft EIS were received. All comments received have been considered in preparing this Final EIS. A majority of the comments received were related to airspace management, air quality, wildlife, environmental justice, and subsistence and recreation. Comments generally included the following:

- Concern over increased numbers of aircraft and potential conflicts with other users
- Support for notification procedures
- Provided clarification on specific information
- Requested clarification on specific information, including the program used for modeling mobile source emissions
- Requested clarification of values used to prepare the emissions estimates
- Requested clarification of the calculated number of operations per year
- Requested documentation in the EIS regarding the affects of current and proposed activities on moose
- Concerns that increased activities in DTA will increase disturbance to calving grounds of the Delta Bison Herd along the Delta River
- Concern that administrative activities, access for management and research purposes, and for prescribed fires will be restricted
- Concern over increased pressure on subsistence species because of increased military and support personnel

- Concern that new military and support personnel would not be aware of or respect the importance of tribal values and culture

Comments were generally related to the timing and cost of the Proposed Action, decision process for the alternatives analysis, coordination on airspace use and conflicts, and various comments or questions about environmental analyses. Comments submitted were thoroughly considered, and responses to those comments are presented in the following sections.

Comments on the Draft EIS have been addressed and incorporated into this Final EIS by modification of the text and/or written explanation. A table that summarizes the changes between the Draft EIS and the Final EIS has been included at the beginning of this Final EIS to direct the reader to the key changes.

This section includes copies of the individual comment letters, forms, and e-mails, excerpted comments from agency meeting transcripts, excerpted comments from tribal meeting transcripts, official public comments from public meetings, and the associated responses. All public comments that were received have been included in the Administrative Record and have been considered during the preparation of the Final EIS.

The comment documents are organized in this section as follows:

- Individual comment letters/forms/e-mails (includes public and agency) – by order in which received (Section 9.2).
- Excerpted comments from agency, public, and tribal meeting transcripts (Section 9.3)

The individual comment letters, forms, and e-mails are presented by assigned document number, which is based on the order in which it was received. Each letter, form, or e-mail received has been assigned a separate document number. Transcripts from public, agency, and tribal meetings were assigned document numbers (i.e., transcripts from the May 18, 2009, agency meeting in Anchorage is T1). The comments within each document are numbered by the order in which they were presented. Finally, each comment was given a category identifier based on the issue or section of the EIS to which it refers. For example, the first comment from the first letter/form/e-mail received expressed general support of the Proposed Action. This comment is identified as 01-01-General Support.

Table 9.1.a provides an index of the names of the commenters and the page number where the comments and the responses are located.

Responses for each comment are presented to the right of the original comment.

TABLE 9.1.a
Index of Comments Received on the Draft EIS
USARAK Aviation EIS

Name	Document ID Number	Beginning Page Number
Comment Letters/Forms/E-mails		
Jeff Shannon	01	9-5
Richard Miller	02	9-6
Steve Floyd	03	9-7

TABLE 9.1.a
Index of Comments Received on the Draft EIS
USARAK Aviation EIS

Name	Document ID Number	Beginning Page Number
USFWS – Anchorage	04	9-8
Joy Morrison	05	9-9
Diane Shoemaker	06	9-10
FAA – Western Service Area	07	9-11
FIA – General Aviation Association	08	9-12
DOI – Anchorage	09	9-15
DEC – Air Quality	10	9-17
Joan Koponen	11	9-21
Charles Whitaker	12	9-22
U.S. Congress – Congressman Don Young	13	9-24
BLM – AFS (1 of 2)	14	9-27
ADFG	15	9-29
EPA – Region 10	16	9-35
BLM – AFS (2 of 2)	17	9-44
Mayor Jim Whitaker, FNSB	18	9-46
<i>Excerpted Comments from Agency Meeting Transcripts</i>		
Richard Vickery, FAA	T1	9-51
Lt. Col. Scott Babos, Air Force	T1	9-52
Erik Johnson, U.S. Army	T1	9-53
Mayor Jim Whitaker, FNSB	T2	9-55
Malcom Nason, Eielson AFB	T2	9-55
Chip Houde, BLM	T2	9-56
Colonel Randy Barker, Elmendorf AFB	T2	9-57
<i>Official Comments from Public Meetings</i>		
Pete Haggland	T3	9-58
Luke Hopkins	T3	9-60
Larry Landry	T3	9-61
Robert Mulford	T3	9-63
<i>Excerpted Comments from Tribal Meetings</i>		
President Gerald Albert, Northway Village Council	T4	9-64
ADFG	Alaska Department of Fish and Game	
AFB	U.S. Air Force Base	
BLM – AFS	U.S. Bureau of Land Management	
DOI	U.S. Department of Interior	
DEC	State of Alaska, Department of Environmental Conservation	
EPA	U.S. Environmental Protection Agency	
FAA	Federal Aviation Administration	
FIA	Fairbanks International Airport	
FNSB	Fairbanks North Star Borough	
USFWS	U.S. Fish and Wildlife Service	

9.1 Comments Received from Individual Comment Documents, and Army Responses

This section includes comment documents received from agencies and members of the public separately from the Draft EIS meetings. The full comment document is provided on the left-hand side of the page, and the Army's responses to the comments are provided on the right hand side of the page. In the situation of a comment document with multiple comments, the Army's responses to the individual comments are listed separately and are given a unique comment number. For example, comment document number 07 includes four separate comments, which are comment numbers 07-01, 07-02, 07-03, and 07-04. Each of these comments has a separate response provided adjacent to the comment letter.

From: Jeff Shannon
To: McEnteer, Carrie L Ms CTR USA IMCOM
Subject: Stationing and Training of Increased Aviation Assets within USARAK EIS
Date: Saturday, May 02, 2009 9:29:02 AM

Ms. McEnteer,

I would like to voice my support for the U.S. Army's proposal to bring a new aviation unit to Fort Wainwright. I am a civilian who does not work in construction or any industry that directly supports the military, so my support is based on the knowledge that adding such an aviation unit will be in the best interest of the community as a whole. The strategic military function and local economic boost will be to the benefit of both Alaskans and Americans as a whole. While I understand that there will be additional noise, and other minor environmental impacts these will be far outweighed by the overall benefits that this move would bring. I sincerely hope that the army moves forward with these plans to bring an aviation unit to Fort Wainwright.

Sincerely,

Jeff Shannon
Fairbanks, AK

Hotmail® has ever-growing storage! Don't worry about storage limits. Check it out.
<blocked[http://windowslive.com/Tutorial/Hotmail/Storage?](http://windowslive.com/Tutorial/Hotmail/Storage?ocid=TXT_TAGLM_WL_HM_Tutorial_Storage1_052009)
ocid=TXT_TAGLM_WL_HM_Tutorial_Storage1_052009>

01-01, General Support

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS.

From: Dick Miller
To: McEntee, Carrie L Ms CTR USA INCOM
Subject: Army Expansion in Fairbanks
Date: Wednesday, May 20, 2009 4:55:23 AM
Importance: High

To Whom It May Concern:

I am opposed to any further expansion which would bring more soldiers and their families to Fairbanks. I feel that enough is enough. Their presence is essentially ruining a way of life here. It does not benefit the average person only some of the businesses in town. It brings more noise, pollution, traffic and people. The isolation of Fairbanks is what brought many of us here-to escape the noise, traffic, pollution and people. I for one would like to see the Army/Air Force reduce its presence rather than increase it.

Sincerely,

Richard E. Miller

02-01, General Opposition

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS and has noted your opposition to the Proposed Action. As described in Section 1.3 of the Draft EIS, the types and numbers of aviation assets currently available to U.S. Army Alaska are not sufficient to employ the full range of integrated tactical combat support options, or to provide the full range of integrated tactical training needs, required by the modern Brigade Combat Team (BCT). To support current and future national defense requirements, U.S. Army Alaska needs to reorganize and augment its existing aviation assets to create a front-line aviation unit. Such a unit would provide the needed local capability for integrated training and the needed force capacity for deployment abroad with the type of Army aviation assets and units that support BCTs in an actual combat environment. Please see Section 1.3 for information on the purpose and need of the Proposed Action.

From: alaska@oyds@od.net
To: thEntree_Cornie.L.Hs.CTR_USA.IMCOM
Cc: stevefloyd@1454560.com
Subject: RE:ARMY EXPANSION in FBKS
Date: Wednesday, May 20, 2009 8:00:39 AM

To Whom It May Concern,

I wish to weigh in on the idea of expanding the aviation unit(s) at Fort Wainwright; please do! Having served 5 years in the Army myself, I recognize the strategic location of Fort Wainwright AND the importance of how many possible flight days we have here, compared to Anchorage or anywhere else in Alaska. While I suspect that some of my neighbors may complain about added noise from having Apache helicopters based nearby, these are the same people who will complain if the sun shines too brightly or if it's too hot or too cold- there's no pleasing them, so don't bother. For the REST of us, the sound of helicopters, like the sound of small arms fire at the range, is the sound of freedom!! AND the added troops brought to Fairbanks are more likely to be those with families, which is only going to benefit our community. Feel free to use my name in any discussion you may have, and count me as a strong supporter of expanding the aviation units at Fort Wainwright.

Steve Floyd
921 Cowles
Fairbanks, AK
99701
(907) 458.0495 (h)
(907) 687.3260 (c)

03-01, General Support

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Anchorage Fish and Wildlife Field Office
605 West 4th Avenue, Room G-61
Anchorage, Alaska 99501-2249



in reply refer to AFWFO

May 21, 2009

Carrie McEnteer
Environmental Planning Branch Chief
724 Postal Service Loop #4500
Fort Richardson, Alaska 99505

Re: U.S. Army Alaska DEIS Stationing and Training of Increased Aviation Assets (*Consultation number 2009-0105*)

Dear Ms. McEnteer,

On April 27, 2009, we received the draft Environmental Impact Statement relative to the U.S. Army Alaska stationing and training of increased aviation assets. Only Fort Richardson is in our area; the Fairbanks Field Office is responsible for the area containing Fort Wainwright, Donnelly Training Area, Tanana Flats Training Area, and Yukon Training Area.

Our records indicate that there are no federally listed or proposed species, and/or designated or proposed critical habitat, within the action area of the proposed project for southwest Alaska. In view of this, requirements of section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq., as amended; ESA) have been satisfied. However, obligations under the ESA must be reconsidered if new information reveals project impacts that may affect listed species or critical habitat in a manner not previously considered, if this action is subsequently modified in a manner which was not considered in this assessment, or if a new species is listed or critical habitat is determined that may be affected by the identified action.

This letter relates only to federally listed or proposed species, and/or designated or proposed critical habitat, under our jurisdiction; namely, the Aleutian shield fern (*Polystichum aleuticum*, listed as endangered in 1988), spectacled eider (*Somateria fischeri*, listed as threatened in 1993), North American breeding Steller's eider (*Polysticta stelleri*, listed as threatened in 1997), the southwest distinct population segment of northern sea otter (*Enhydra lutris kenyoni*, listed as threatened in 2005), short-tailed albatross (*Phoebastria albatrus*, listed as endangered in 2000), polar bear (*Ursus maritimus*, listed as threatened in 2008), Kittlitz's murrelet (*Brachyramphus brevirostris*, listed as a candidate species in 2005), and yellow-billed loon (*Gavia adamsii*, listed as a candidate species in 2009). This letter does not address species under the jurisdiction of the National Marine Fisheries Service, or other legislation or responsibilities under the Fish and Wildlife Coordination Act, Clean Water Act, National Environmental Policy Act, Marine Mammal Protection Act, Migratory Bird Treaty Act, or Bald and Golden Eagle Protection Act.

Thank you for your cooperation in meeting our joint responsibilities under section 7 of the ESA. If you have any questions, please contact me at (907) 271-3063 and refer to consultation number 2009-0105.

Sincerely,

Tim Langer, Ph.D.
Endangered Species Biologist

T:\s7\2009 sec 7\Technical Assistance\20090105 s7 letter.pdf

1

04-01, Wildlife

The species most likely to result in a future review of potential project impacts is the beluga whale (and only if Alternative 3 is the selected alternative). The EIS states, "If Alternative 3 is identified as the Army's decision, the Army will consult with NMFS in compliance with the requirements of the ESA and Marine Mammal Protection Act (MMPA) prior to implementation of the Proposed Action." Army policy is to respond as required to changes in the status of, or designation of critical habitat for, federally listed species under the Endangered Species Act. Please see Subsection 3.6.1.1.

From: [Joy Morrison](#)
To: [McEnteer, Carrie L](#), [Ms. CTR USA INCON](#)
Subject: Army EIS and Fairbanks
Date: Thursday, May 21, 2009 12:01:42 PM

Ms McEnteer: as a Fairbanks citizen for twenty years, and a member of the Friends of Creamer's Field wildlife refuge, I would like to voice my concern for the intended number of aircraft training flyovers that you will be making in the future if Alternatives 2 or 3 of your EIS are adopted. I have no problem with more aircraft, nor more personnel at Fort Wainwright but I do not want to have noisy aircraft (mainly helicopters I understand) flying anywhere near the 200 acre refuge.

It is after all a REFUGE. It is peaceful and quiet and very tranquil. It is home to many species of birds and animals, and a wonderful place to take long walks. It is very well used all year round.

I would like to request that all aircraft trainings take place elsewhere, nowhere near the city, and especially nowhere near any part of Creamer's Field.

Thank you.

Joy Morrison
816 5th Ave
Fairbanks, 99701

05-01, Wildlife (Noise)

Thank you for taking the time to comment. The Army provides financial support to the refuge to attract birds to it and divert them from areas closer to Ladd Army Airfield, where they could interfere with aircraft operations. The refuge is located outside the designated flight corridors for helicopters from FWA.

From: [Diane Shoemaker](#)
To: [McEnroe, Carrie L Hq CTR USA IMCOM](#)
Subject: EIS Support
Date: Wednesday, June 03, 2009 12:37:05 PM

We want to voice our support for the expansion of the Aviation Force! We love and want the Army in Fairbanks. The Army is a great community partner with Fairbanks and anything that we can do to support the Army and Ft. Wainwright, we will do. We appreciate the contributions that the DOD and Army make to our community.
Please let me know if there is anything that we can do to support this expansion.

Thanks!

Diane Shoemaker

Fountainhead Hotels

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Diane Shoemaker

Sales Director

(907) 458-6117 <http://www.fountainheadhotels.com>

06-01, General Support

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS.

From: richard.vickery@faa.gov
To: McEntee_Carrie_L.Ms.CTR_USA.IMCOM
Subject: Fw: EIS
Date: Friday, June 05, 2009 2:04:17 PM

Probably helps to spell your name right.

Richard Vickery
FAA ATREP, Western Service Area
Elmendorf AFB, Alaska
Office: 907-552-4093
Cell: 907-947-7090

-----Forwarded by Richard Vickery/ANM/FAA on 06/05/2009 01:56PM -----

To: Carrie.McEntee@us.army.mil
From: Richard Vickery/ANM/FAA
Date: 06/05/2009 01:52PM
Subject: EIS

Carrie,
Couple of comments. Please keep in mind that I am not an environmental specialist or implying approval/disapproval of the document.

07-01 Sect. 1.4.3.7 In regard to the "Charting the Delta Military Operations Area Complex at Eielson AFB". And further in the paragraph again while leaving out the Eielson portion. There is no such document. That was the initial title of the "draft" draft document and was deemed misleading by the FAA as it implied the airspace action to make the MOA's permanent was complete, this was simply to chart the airspace. The actual title of the document is "Establish the Delta Military Operations Area Complex Environmental Assessment".

07-02 Sect. 3.2.3.2 You refer to R2203G encompassing Eagle Flats area. Never heard of "G". R2203A, B, and C are all I know of.

07-03 Page 4-158 Third paragraph down. The USAF proposes to "charter" the Delta TMOA. What is actually happening is that the AF is in the process of making the temporary MOA's permanent. Which, if successful, will indeed then be on maps, charts, etc.

07-04 Figure 3.2b Existing Special Use airspace. I find it somewhat misleading. Previous diagrams showed Restricted Area in the legend and accurately depicted those areas. The legend on this diagram simply says "restricted", and encompasses Restricted Areas (military use) and areas that the military is "restricted" or excluded from. IE. Chena Hot Springs resort. May want to differentiate the two for clarity.

Thanks, Rick

Richard Vickery
FAA ATREP, Western Service Area
Elmendorf AFB, Alaska
Office: 907-552-4093
Cell: 907-947-7090

07-01, Airspace Management

The title for the Environmental Assessment was reevaluated following receipt of this comment. The Environmental Assessment was accessed through the Elmendorf AFB website at <http://www.elmendorf.af.mil/shared/media/document/AFD-081125-015.pdf>. No changes were made to the EIS text based upon the title used by the U.S. Air Force for the Draft Environmental Assessment (November 2008). However, as suggested by comment 07-03, the EIS text in Section 4.12 was revised (see response to comment 07-03).

07-02, Airspace Management

Text revised to R2203C.

07-03, Airspace Management

Text revised to more accurately describe the proposed changes to the Delta TMOA.

07-04, Airspace Management

Figure 3.2.b has been revised to show Restricted Areas consistent with Figure 3.2.a.

From: jbowden@acsalaska.net
To: [McEnteer, Carrie L](#); [Ms. CTR USA IMCOM](#)
Cc: [Arthur M. Hueser](#); [Tom George](#); [Don Dearborn](#)
Subject: EIS Comments - Aviation Assets within US Army Alaska
Date: Saturday, June 13, 2009 5:23:20 AM
Attachments: [US Army Aviation Assets EIS 2002b.pdf](#)

Ms McEnteer -
Please find attached comments from the Fairbanks International Airport General Aviation Association concerning the Draft EIS, Stationing and Training of Increased Aviation Assets within U.S. Army Alaska.

Jim Bowden
President
FIA-GAA

Fairbanks International Airport General Aviation Association

6/2/2009

Ms. Carrie McEnteer, Environmental Planning Branch Chief
 US Army Garrison Alaska, Fort Wainwright
 Directorate of Public Works
 1060 Gaffney Road #4500
 Fort Wainwright, AK 99703-4500
 Email: carrie.mcenteer@us.army.mil

Re: Draft EIS, Stationing and Training of Increased Aviation Assets within U.S. Army Alaska

Dear Ms. McEnteer,

- 08-01 The Fairbanks International Airport General Aviation Association (FIA GAA) welcomes the opportunity to comment on the subject Draft EIS. As you know the topography in the Alaska Interior and historical uses of its airspace find many of us sharing the same airspace. In the very recent years significant increases in aviation activity, both by the Army and Air Force, have occurred and more is proposed. Many of these have affected (and will affect) the busy general aviation corridor up the Tanana River from Fairbanks and on into Canada. The activity addressed by the Draft EIS would also occur in a principal civilian training area for pilots in Fairbanks. To assure our mutual safety and minimize potential conflicts there is a need for ongoing coordination of airspace use, notification of planned activity, and excellent communication between civilian and military aircraft sharing the same space. The Draft EIS identifies significant commitments for those purposes. However, we are left uncertain about one aspect, Operational Communication.
- 08-02 Coordination: Participation by the Army in the Alaska Civil Military Aviation Council (ACMAC), and holding quarterly USARAK Aviation Safety Standard Council meetings to include representation from the general aviation sector would be a significant aid to coordination of airspace use. We applaud this commitment.
- 08-03 Notification: Use of the Notice to Airmen (NOTAM) system to alert both local pilots and those arriving into the area of significant activity is a very valuable tool in avoiding conflicts, and notifying civilian pilots to use SUAIS.

08-01, Airspace Management

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS.

08-02, Airspace Management

As noted by the comment, the Army intends to continue participation in the Alaska Civil Military Aviation Council (ACMAC) and hold quarterly U.S. Army Alaska Aviation Safety Standard Council meetings with the Federal Aviation Administration, U.S. Air Force, and general aviation representatives. This information is included in Subsection 4.2.3 of the Final EIS. The Record of Decision will document the final mitigation commitments from the Army for airspace.

08-03, Airspace Management

As noted by the comment, the Army intends to continue the use of the Notice to Airmen (NOTAM) system. This information is included in Subsection 4.2.3 of the Final EIS. The Record of Decision will document the final mitigation commitments from the Army for airspace.

08-04

Operational Communication: The Draft EIS is unclear about the extent to which the Army is committing to use of SUAIS and its Range Control function. Use of SUAIS, including its range control function, by the USAF has been a tremendous success, both for the Air Force and for participating civilian pilots. It has clearly increased the safety to both military and civilian pilots and it has reduced disruptions of USAF training activity because of the operational communication that it provides. We strongly encourage USARAK to participate in a similar fashion. Sharing SUAIS would readily accommodate use of a single VHF communication frequency for civilian pilots. Since the Army, USAF, and civilian activity overlaps geographically, it is important that a single frequency be used. Without USARAK participation in SUAIS and its range control function the impact of increased training would be significant to the safety of civilian aviation in this region. We hope that the final EIS will reflect such a commitment by USARAK. If further discussion would be helpful, the FIA GAA would welcome the opportunity to assist.

James Bowden, President, FIA-GAA

cc: Tom George, AOPA Alaska
Ron Dearborn, AOPA ASNV, FAI

08-04, Airspace Management

The Army is currently evaluating its participation in the SUAIS program. The SUAIS is primarily a U.S. Air Force program to provide a recorded message to aviators after business hours. Currently, Army Range Control expands its firing desk operations to 24 hours when operations are ongoing, either aviation or ground centric. Range Control can advise personnel who utilize the Army's frequency (FREQ (FM) 38.30) as to operational ranges and areas to avoid. Recent Army communication suite upgrades have created the capability to monitor and transmit on VHF.

From: Douglas_Mutter@ios.doi.gov
To: McEnteer_Cornie.L.Hs.CTR_USA_HMCOM
Cc: Pamela_Bergmann@ios.doi.gov
Subject: DOI Comments on the Draft EIS for Aviation Assets
Date: Monday, June 15, 2009 9:54:53 AM
Attachments: [EB09_S16_Aviation Assets DEIS_DOI_comments.pdf](#)

Ms. McEnteer:

Attached are the U.S. Department of the Interior comments on the Draft Environmental Impact Statement for Stationing and Training of Increased Aviation Assets within U.S. Army Alaska.

Thank you for the opportunity to comment.

Douglas Mutter
Regional Environmental Assistant
U.S. Department of the Interior
Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501
907-271-5011
(fax: 907-271-4102)
douglas_mutter@ios.doi.gov



United States Department of the Interior

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



9043.1
LR09/516
PEP/ANC

June 15, 2009

Ms. Carrie McEnteer
Environmental Planning Branch Chief
US Army Garrison Alaska, Fort Wainwright
Directorate of Public Works
Attn. IMPC-FWA-PWE (McEnteer)
1060 Gaffney Road #4500
Fort Wainwright, AK 99703-4500

Dear Ms. McEnteer:

The U.S. Department of the Interior has reviewed the April 2009 Draft Environmental Impact Statement for the Stationing and Training of Increased Aviation Assets within U.S. Army Alaska. We have no comments to offer at this time.

Thank you for the opportunity to comment. If you have questions, you may contact me at 907-271-5011.

Sincerely,

Pamela Bergmann
Regional Environmental Officer – Alaska

09-01, No Comment

Thank you for your participation in the Army's National Environmental Policy Act (NEPA) process. We appreciate your involvement.

From: [Heil, Cynthia L \(DEC\)](#)
To: [McEnteer, Camie L Hs CTR USA JHCOM](#)
Cc: [jconner@co.fairbanks.ak.us](#); [Vaupel.Claudia@epamail.epa.gov](#); [Morris, Steve S](#); [Edwards, Alice L S \(DEC\)](#)
Subject: DEC comments on Draft EIS Stationing and Training increase w/in US Army Alaska
Date: Monday, June 15, 2009 1:38:50 PM
Attachments: [USArmy Wainwright training EIS comments.pdf](#)

Please find attached DEC Air Quality comments on the: "DRAFT ENVIRONMENTAL IMPACT STATEMENT STATIONING AND TRAINING OF INCREASED AVIATION ASSETS WITHIN U.S. ARMY ALASKA"

The hard copy is in the mail. Please let me know if you have any questions.

Steve, I have added you on this email as it appears that MOA air quality was not contacted (see Chapter 8) and there are some emission calculations for MOA in Appendix D. Attached is the link to the EIS.

http://www.usarak.army.mil/conservation/NEPA_FWA.htm
<blockedhttp://www.usarak.army.mil/conservation/NEPA_FWA.htm>

Cindy Heil

Mobile Source Section Manager, Acting Air Non-Point & Mobile Sources Program Manager

907-269-7579

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF AIR QUALITY
AIR NON-POINT & MOBILE SOURCES

SARAH PALIN, GOVERNOR

619 E. Ship Creek Ave., Suite 249
Anchorage, AK 99501
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<http://www.state.ak.us/dec/>

June 15, 2009

Ms. Carrie McEnteer
Environmental Planning Branch Chief
US Army Garrison Alaska, Fort Wainwright
Directorate of Public Works
Attn: IMPC-FWA-PWE (McEnteer)
1060 Gaffney Road #4500
Fort Wainwright, AK 99703-4500

Subject: Comments on Draft Environmental Impact Statement Stationing and Training of
Increased Aviation Within U.S. Army Alaska

Dear Ms. McEnteer:

The Alaska Department of Environmental Conservation (DEC) is pleased to have the opportunity to comment on the air quality analysis presented in the subject Environmental Impact Statement (EIS); they are:

1. The following statement in the Executive Summary is unsupported:

10-01

Although increased vehicles emissions and operation of new stationary sources that emit air pollutants would occur under both alternatives, the emissions would not affect ambient air quality.

No analysis is presented which demonstrates the ambient concentrations are unaffected by the increased emissions associated with construction and operations.

2. There is no requirement to quantify directly emitted or precursor emissions for PM_{2.5} because the nonattainment designation for the Borough does not become effective until 12 months after EPA publishes a Federal Register Notice (FRN) formally announcing the nonattainment designation. The FRN announcing the Fairbanks PM_{2.5} nonattainment designation has not yet been published. The fact that the analysis addressed PM_{2.5} and precursor emissions is commendable, but there is no formal requirement for the analysis at this time.

10-02

"Clean Air"

Printed on Recycled Paper

10-01, Air Quality

Comment noted; consistent with the analysis in Section 4.7, the text in the Executive Summary was revised to correctly reflect that the emissions would not adversely affect the current ambient air quality classifications.

10-02, Air Quality

The Army is aware there is currently no formal requirement to provide this analysis. However, based on concern regarding PM_{2.5} expressed at public meetings, the Army felt that this analysis was necessary to address public concern. Communications and involvement with the Fairbanks North Star Borough (FNSB) regarding the PM_{2.5} designation also led to the decision to analyze the potential effects of this pollutant.

	Ms. Carrie McEnteer	2	June 15, 2009
10-03	<p>3. The emissions analysis presented in both Section 4.7 and Appendix D reference the use of MOBILE6, EPA's mobile source emission factor model. While the use of this model is correct for directly emitted PM and related precursor emissions, it is not for carbon monoxide (CO) in Fairbanks. The CO Maintenance Plan developed for Fairbanks uses an Alaska version of MOBILE6, titled AKMOBILE6. This version of the model was developed to more accurately represent the effect of cold start idle and the benefits of electrical plug-in units that are common in Fairbanks.</p>		
10-04	<p>4. Appendix D does not present the activity values used to prepare the emission estimates presented in Chapter 4.7. No estimates of vehicle miles traveled (VMT) are presented, which are combined with emission factors from MOBILE6 to prepare the estimates of vehicle travel related emissions. It is unclear if the MOBILE6 emission factors reflect the benefits of the current vehicle inspection program, which the Borough plans to terminate at the end of this year. Similarly, it is unclear if extended idling emissions are accounted for in the analysis.</p> <p>5. Alternative 3 is described as producing:</p> <p><i>...a three-fold increase in Army aviation activities in the Fairbanks-North Star Borough region. While this may appear to be a substantial increase in the number of takeoffs and landings at Ladd AAF, it equates to only 17 additional air operations per day.</i></p> <p>Appendix D indicates that FWA will have 2,040 additional operations of Kiowa OH-58D helicopters and 1,000 additional operations of Blackhawk HH-60s helicopters. Since the assumption stated in Appendix D for FWA is that there are 240 working days per year, the total number of operations would be 17 x 240 or 4,080 operations per year. The analysis only refers to 3,040 operations per year. Is this a mistake, or are the helicopters operated on a smaller number of working days? The concern is that the emissions from helicopter operations could be understated.</p>		
10-05			
10-06	<p>6. A review of the Agencies and Persons contacted in Chapter 8 shows that no contacts were established with relevant air quality personnel at DEC, the Fairbanks North Star Borough or the Municipality of Anchorage.</p>		
10-07	<p>Overall, we do not expect that the increased training will exceed CO budgets for general conformity or cause or contributed to increased violations of either the ambient CO or PM_{2.5} standard. We are, however, concerned about the precedent of using a different version of MOBILE6 than the one used in the applicable Maintenance Plan to make the applicability finding. We are also concerned that some of the information used to prepare the emission calculations has not been presented so that it is possible to comment on whether the assumptions and calculations are consistent with those employed in the Maintenance Plan. We believe that these issues could have easily been resolved if the Army had contacted relevant state and local air quality agencies in advance of preparing the analysis and recommend that in the future this practice be followed.</p>		

10-03, Air Quality

Alternative 3 was used as a worse-case scenario for air quality assessment modeling (see Appendix D). Alternative 2, identified by the Army as the Preferred Alternative, would have less of an emissions impact than Alternative 3. The MOBILE6 program was chosen to provide an initial (first cut) estimate of emissions. Region-specific idling and climate values were used for modeling in the MOBILE6 program. Threshold limits were not exceeded with the worse-case scenario and, therefore, a detailed and expensive emission modeling project or full conformity determination study was not warranted. Also see the response to comment 10-07, below.

10-04, Air Quality

An attachment that outlines calculations and assumptions used for Appendix D and Section 4.7 was added to Appendix D. The modeling inputs included the mean temperatures for the regions and idle parking activities at the proposed locations. No CO mitigation measures used within the maintenance areas have been included in the modeling as to provide a rough-cut conservative estimate of emissions. A conservative conformity applicability analysis approach was taken to ensure the threshold values would not be exceeded.

10-05, Air Quality

Subsection 4.7.2.5, Greenhouse Gas Emissions, was rewritten. Modeling of vehicle emissions is based on 240 working days. Modeling of helicopter emissions was revised for the Final EIS to be consistent with the number of takeoffs and landings per year, as listed in Table 2.5.a. Modeling results of helicopter emissions yielded minor increases over the numbers presented in the Draft EIS; however, the conclusions of the impact analysis did not change.

10-06, Please see next page.

10-07, Please see next page.

Ms. Carrie McInteer

3

June 15, 2009

The Division of Air Quality recently updated its web pages to include pages dedicated to conformity. Here is the link to the conformity homepage, which may provide additional information for future conformity issues: <http://www.dee.state.ak.us/air/anpms/conf/confhome.htm>

Thank you for the opportunity to comment on the EIS and I look forward to your responses.

Sincerely,




Cindy Heil
Section Manager Mobile Sources
Acting Manager ANPMS

cc: Claudia Vaupel, U.S. EPA
Jim Conner, Fairbanks North Star Borough

10-06, Air Quality-comment shown on previous page.
A copy of the Draft EIS was sent to the Alaska Department of Environmental Conservation-Air Quality Division, the Fairbanks North Star Borough (FNSB), and the Mayor's Office in Anchorage as indicated in Chapter 6.

10-07, Air Quality-comment shown on previous page.
The Army is in agreement that the Proposed Action will not cause or contribute to an increased violation of either the ambient CO or PM_{2.5} standard. Use of MOBILE6 rather than AKMOBILE6 was a means to provide a conservative estimate of the worse-case scenario, which is not the Preferred Alternative. MOBILE6 is more conservative because it does not reduce emissions for use of air quality improvement measures included in the Fairbanks maintenance plan, such as use of electrical plug-ins to heat engine blocks. The Preferred Alternative would have less personnel stationed at FWA than the worse-case scenario. FWA air quality personnel communicate with the local State air quality authority and the Fairbanks North Star Borough (FNSB) air quality authority on many issues and will continue consultation on future projects. In addition, a majority of information assimilated for the air quality analysis was derived from research using the Municipality of Anchorage CO maintenance plan, the FNSB CO maintenance plan, and State and federal resources. The Army appreciates the identification of additional air quality contacts for use during future actions.



Draft Aviation EIS

Stationing and Training of Increased Aviation Assets within U.S. Army Alaska Draft Environmental Impact Statement

Public Comment Sheet

Please Print Clearly

Name: Joan Koponen Date: May 21, 2009

Organization that You Represent: _____ Self ☒

Mailing Address: 710 Chena Ridge City: Fairbanks State: Alaska Zip: 99709

E-mail Address: _____ Telephone: _____


Comments: I am opposed to more troops at Ft. Wainwright, the military trains how to be against, I feel we need to further skills + ways to solve problems not aggravate them. Killing is not the way to solve problems.

Joan Koponen

Please Note:
The Public Comment Period Ends June 22, 2009
Submit Your Comment Sheet at this Meeting by Placing in one of the Comment Boxes
or
Fold/Staple/Stamp and Return by Mail, or Fax to (907) 361-9867

11-01, General Opposition,
U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS and has noted your opposition to the Proposed Action. The general missions of the Army include providing protection for the United States and its interests by securing its airspace, land, and sea interest and jurisdictions; providing support to civil authorities in order to provide the protection and support needed to sustain the United States' national interest and stability; providing support during national emergencies by assisting civil authorities in maintaining emergency preparedness throughout the nation; and working in concert with the three other major branches of the U.S. military.

Jun-09-08 09:57am From: SATELINE DIGITAL 9274740055 T-030 P 01/01 P-454



Aviation EIS

Stationing and Training of Increased Aviation Assets
within U.S. Army Alaska
Draft Environmental Impact Statement

Public Comment Sheet

Please Print Clearly

Name: Charles Whitaker Date: 6-17-09

Organization that You Represent: _____ Self ☒

Mailing Address: Box 81985 City: Fairbanks State: AK Zip: 99708

E-mail Address: _____ Telephone: 907-388-2305

Comments:

12-01 I understand the Army's rate of Class A aviation accidents is around 8 per 100,000 flying hours. With the planned operations tempo of the new unit, how many accidents will likely occur here annually?

12-02 NOISE! is a huge concern. I have been shown flight corridors that the helicopters should be using to the north and to Delta from Wainwright. Many helicopters often are flying north of Fairbanks, over Goldstream Valley, a quiet and peaceful part of the Northstar Borough. I was told at the public meeting these were familiarization flights. Are these flights needed? Can a request be made to not fly out of the normal flight corridors except for emergency situations?

12-03 Will there be restrictions on flying when the air quality is poor?

12-04 Will the Army build another training airport for these operations south of Fairbanks, like they have at Ft. Rucker or other busy aviation bases?

12-05

Please Note:
The Public Comment Period Ends June 22, 2009
Submit Your Comment Sheet at This Meeting by Placing in one of the Comment Boxes
or
Fold/Stamp/Stamp and Return by Mail, or Fax to (907) 381-6867

12-01, Airspace Management

The Army's Class A-C accident rate during fiscal year 2006 was 7.56 per 100,000 flying hours. This rate of accidents includes the high number of operations flown as a result of warfare in both Iraq and Afghanistan as well as worldwide deployment of aviation units. It includes flight mission profiles in which helicopters are flown below tree height at variable airspeeds, using natural environmental features to provide camouflage, often in unfamiliar and hostile environments. Because the accident rate includes all Army aviation operations, it is not directly applicable to increased training under the Proposed Action. As discussed in Subsection 4.2.1.1, the State of Alaska experienced an average of two mid-air collisions a year over the 10 years ending in 2002. None of these collisions included military aircraft. The Army is dedicated to accident prevention and maintains an aviation accident investigation and reporting system for collection, analysis, and distribution of accident information and strategies for prevention of future accidents. U.S. Army Alaska has established procedures to maintain separation between its own aircraft, U.S. Air Force traffic, and civilian traffic. Please see Section 4.2 for information on aviation safety. (Information for Recommendations for Improving the U.S. Army's Aviation Accident Reporting and Classification System. Paper Number 2007-03-002. McLain, Joseph R. and von Thaden, Terry L. March 13-15, 2007.)

12-02, Noise

While military aircraft typically follow established flight corridors, they are not restricted from other areas used by general aviation (Section 3.2). The Proposed Action would not result in new noise zones; however, there would be increased annoyance with implementation of either Alternative 2 or 3. The Army would continue to implement existing requirements that regulate military helicopter travel outside U.S. Army Alaska lands. Adherence to these requirements, along with other mitigation measures for noise, would result in less-than-significant impacts. Please see Table 4.4.b and Subsection 4.4.3 for a summary of the noise impacts by alternative and mitigation measures, respectively.

Please see the following page for responses to comments 12-03 through 12-05.

Continued from letter on previous page.

12-03, Airspace Management

There are no restrictions on aviation activities during periods of poor air quality. However, if air quality impaired visibility, VFR flights would be limited and flight activity reduced to alleviate safety concerns. Emissions from increased aircraft operations are minor and are not expected to significantly affect ambient air quality. Please see Subsections 4.7.2.2.4 and 4.7.2.3.4 for information on aviation-related emissions.

12-04, Alternatives - General

The proposed siting of facilities was developed with consideration of existing and future operational requirements. Proposed Blackhawk outdoor parking for both action alternatives is located west of Taxiway B and all other proposed parking areas and proposed facilities construction and demolition are located south of the airfield. The potential impacts due to increased U.S. Army Alaska helicopter activity in public airspace are not expected to significantly impact emergency response. U.S. Army Alaska will continue coordination with other airspace users. Emergency responders will continue to be given priority over training exercises. No significant impacts to the Bureau of Land Management (BLM) operations are anticipated. Please see Figures 2.5.b and 2.5.c for the proposed siting of facilities associated with each alternative and Subsections 4.2.2.4 and 4.2.3 for a summary of airspace impacts. Also reference the responses to comments T2-6 and T2-7 (transcripts of agency meetings in Fairbanks).

12-05, Alternatives - General

An additional airport south of Fairbanks is not a part of the Proposed Action. Please see Section 2.3 for a description of the Proposed Action.

From: [Ryan, Thomas](#)
To: [McEnteer, Carrie L](#); [Mc CTR USA JHCOM](#)
Subject: Comments on Draft EIS
Date: Monday, June 22, 2009 12:27:52 PM
Attachments: [USARAK Aviation Comments.pdf](#)

Ms. McEnteer,

Attached are Congressman Young's comments on the Draft Stationing and Training of Increased Aviation Assets within U.S. Army Alaska Environmental Impact Statement.

The original will follow via mail.


Thanks,

Thomas Ryan
Legislative Assistant
The Honorable Don Young
Congressman for All Alaska
2111 Rayburn HOB
202.225.5765

Sign up for Rep. Young's newsletter at:

<http://www.house.gov/formdonyoung/subscription.htm>
<blockedhttp://www.house.gov/formdonyoung/subscription.htm>

DON YOUNG
CONGRESSMAN FOR ALL ALASKA
WASHINGTON OFFICE
2111 RAQUIN BUILDING
TELEPHONE 202-225-5765



Congress of the United States
House of Representatives
Washington, DC 20515

June 22, 2009

COMMITTEE ON
RESOURCES
COMMITTEE ON
TRANSPORTATION
REPUBLICAN
POLICY COMMITTEE

Ms. Carrie McEnteer
Environmental Planning Branch Chief
U.S. Army Garrison Alaska, Ft. Wainwright
Directorate of Public Works
Attn: IMPC-FWA-PWE (McEnteer)
1060 Gaffney Road #4500
Ft. Wainwright, AK 99703-4500

Dear Ms. McEnteer,

I believe that Alternative 3: Combat Aviation Brigade, would best enhance U.S. Army Alaska's (USARAK) aviation capabilities, improve training opportunities for existing USARAK Forces and improve the Army's ability to support military operations in the Middle East, the Korean Peninsula, the Arctic and throughout the world. Rather than taking no action or fielding only an Aviation Task Force, the Army should take full advantage of the opportunities offered by Alaska by permanently stationing a Combat Aviation Brigade located at Ft. Wainwright, Eielson Air Force Base and Ft. Richardson.

There is no area within the United States that would provide the Army the ability to rapidly deploy a Combat Aviation Brigade as quickly to as many different places in the Globe as Alaska. And, based on recent world events, that ability will become even more important in the future. Alaska is within 4000 miles of the Korean Peninsula, Beijing, Tokyo and Central Europe and is among the closest states to Afghanistan and Iraq. This proximity is especially important as the North Koreans take increasingly belligerent actions, as American military forces surge in Afghanistan and as Russia continues to aggressively pursue the natural resources located in the Arctic. A full Combat Aviation Brigade would provide deterrence and increase the number of options available in dealing with these and any other hotspots that may crop up in Eurasia.

Stationing a full Combat Aviation Brigade in Alaska will also provide an opportunity for realistic and challenging combined-arms, joint and coalition training that no other base would. The Joint Pacific Alaska Range Complex (JPARC) is the largest training area available to U.S. forces in the world. JPARC provides over 65,000 square miles of air training space and 2,490 square miles of ground maneuver training. That space would allow the Combat Aviation Brigade to train with the 1-25th Stryker BCT stationed at Ft. Wainwright, the 4-25th Airborne BCT stationed at Ft. Richardson, the F-16s stationed at Eielson Air Force Base and the F-22s stationed at Elmendorf Air Force Base, along with any naval units that take advantage of the 43,357 square miles of Naval Training Area at the complex. Giving these units the opportunity to train with a Combat Aviation Brigade would ensure they are more than proficient in

1001 Street
June 2009
Anchorage, AK 99501
907-277-1776

101 "2nd Avenue"
Dup 12
Eagleville, Alaska 99721
907-686-0919

1115 W. 2nd Avenue, Suite 10
Ft. Wainwright, Alaska 99703
907-686-7000

Only Traveling
1-800-275-0919

13-01, General Support for Alternative 3

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS and has noted your support for Alternative 3. As discussed in Section 2.8, the Army's Preferred Alternative is Alternative 2, Aviation Task Force. This alternative would augment existing aviation assets to create a new front-line aviation unit in the form of a Task Force. Alternative 2 meets the purpose and need for the Proposed Action and would be smaller in scope and impact than Alternative 3. Soldier and helicopter levels under Alternative 2 would be similar to current (2009) levels, in essence making permanent the temporary stationing that has occurred since 2006 in support of recent overseas deployments.

combined-arms, joint and coalition operations. Finally, Alaska is unmatched in its support for the military. In my 37 years in Congress, I have rarely heard complaints about the military presence in the state. In fact, almost every officer that has held a command in Alaska has told me that the community and political support for the military they see in Alaska is unlike any other state. Alaska provides a quality family environment for our soldiers and their families as well, providing support for the families of deployed soldiers and a welcoming community for all members of the military. Almost one tenth of all Alaskans are veterans, and those who are not still respect and appreciate the service of our military and they go out of their way to show it. This attitude is reflected in the leadership at the local, state and federal level.

While there are some impacts to stationing a full Combat Aviation Brigade in Alaska, most are less than significant and those that may be significant can be dealt with through proper mitigation and by working with the community. Air, water and soil quality impacts can be mitigated and would likely cause no permanent impact. Any potential wildlife impact is likely to be minimal, as the wildlife has already adapted to helicopter flyovers and, if necessary, training schedules can be modified to ensure that nesting and calving seasons are not adversely impacted. Community impacts, such as airspace, noise and housing can be handled by working with community leaders and will be mitigated by the economic benefits that will occur due to increased military construction and permanent stationing of 84 additional helicopters and 2,360 additional soldiers.

The strategic and training benefits that permanent stationing of a full Combat Aviation Brigade will provide vastly outweigh any negative impacts that may occur. Nor would these benefits be as evident with the permanent stationing of an Aviation Task Force, while many of the same negative impacts would still occur. I urge the Army to adopt Alternative 3 and permanently station a full Combat Aviation Brigade at Ft. Wainwright, Eielson Air Force Base and Ft. Richardson.

Thank you for your consideration.

Sincerely,



DON YOUNG
Congressman For All Alaska

From: Mary.Lynch@ak.blm.gov
 To: Mr.Dunbar, Carrie L via CTR USA 14C04
 Subject: EIS comments
 Date: Monday, June 22, 2009 2:27:36 PM

Carrie - These were submitted to me from the BLM-APS Military Zone FMO.

14-01

As noted on page 3-6, procedures and conditions for evaluating fire risks are in place under the Forest and Wildfire Management Plan (USAG-AK 2007) and as stated later in the EIS there is the potential for increased fire activity. The last paragraph in the fire management section on page 3-9 mentions that "...ongoing mitigation and avoidance measures have been effective..."

To be more specific: An increase in fire activity may be mitigated by continuing to adhere to the procedures documented in the Forest and Wildfire Management Plan (USAG-AK 2007).

14-02

p3-6 last complete paragraph on that page, last sentence - A correction: Current statement in EIS is that "...No documentation exists for serious causes..."

BLM Alaska Fire Service maintains a historic wildfire database with records that date to 1950. Fires are also recorded in the national fire reporting system. Each has a cause field.

14-03

p 3-7 paragraph 2 terminology used is "engineered fire breaks" and "firebreaks"; Alaska Fire Service as do other wildland fire references including the National Wildfire Coordinating Group (NWCG) Glossary of Terminology refers to these treatments as fuelbreaks, not fire breaks. Also use of the term fire breaks is inconsistent; it is used as one word "firebreaks" and 2 "fire breaks".

In the NWCG Glossary (<http://www.nwcg.gov/pms/pubs/glossary/v1.htm>), fuelbreak is one word and defined: 1. A natural or manmade change in fuel characteristics which affects fire behavior so that fires burning into them can be more readily controlled.

14-04

P 3-7 paragraph 2, this sentence "Additional BMPs being implemented include determining the need for and maintaining access and egress routes to enable quick and effective response by initial attack forces and evacuations, maintaining fire breaks (including on the southern end of the main Post and the Northern Boundary of the Stuart Creek IA on YTA) locating operational areas within hardwood forests (i.e., not in black spruce), and installing weather stations."

14-05

Alaska Fire Service is unaware of and has not had any opportunity to review or comment on the 2 projects mentioned, (the southern end of the main post and the northern boundary of Stuart Creek)

P3-9 paragraph 1, ordinance misspelled - ordnance

Please call if you have any questions.

14-01, Fire Management

The text was revised by adding language that the Army will continue to adhere to the *Forest and Wildfire Management Plan*.

14-02, Fire Management

The incorrect statement was removed from the text.

14-03, Fire Management

The terminology was revised as indicated.

14-04, Fire Management

The project that refers to the "southern end of Main Post" are the fuelbreaks built to protect Fort Greely. These have been incorporated into the building of the Missile Defense project and are essentially gone. Reference to this specific project has been deleted from Subsection 3.1.2.4. The project referred to as the northern boundary of Stuart Creek is the fuelbreak located at the eastern edge of Stuart Creek Impact Area (IA). This break was put in when they fought fires on the eastern side of YTA. That land is now in limited fire suppression and the fuelbreak is no longer maintained but still functional. The Army is currently in the planning stage of a hazardous fuel reduction project for the Stuart Creek IA. The Army is looking at removing hazardous fuels along North Beaver Creek, Skyline, and Brigadier roads, and also creating a fuelbreak from North Beaver Creek Road to the south fork of the Chena River and from Brigadier Road to Chena River's south fork. The Army is also in the planning stages of creating a fuelbreak around the Blair Lakes IA. Appropriate NEPA analysis will be conducted prior to initiation of any fire management projects. The text in Subsection 3.1.2.4, Table 4.12.a, and Table E-3 has been revised to reflect these changes.

14-05, Fire Management

The spelling of the word was corrected.

Mary Lynch
Planning and Environmental Coordinator
BLM, Alaska Fire Service
Phone: 907 356-5863

From: [Palach, Brad M \(DEG\)](#)
To: [McEnteer, Carrie L Ms CTR USA IMCOM](#)
Subject: Aviation Assets EIS Comments
Date: Monday, June 22, 2009 2:45:15 PM
Attachments: [6-22-2009 Aviation Assets EIS Comments.pdf](#)

Carrie

Attached is a PDF version of our comments concerning the Draft Environmental Impact Statement Stationing and Training of Increased Aviation Assets within U.S. Army Alaska. A hard copy will follow by US Mail.

Thanks for your assistance and please contact me if you have any questions.

Brad Palach

ANILCA Program Coordinator

Alaska Department of Fish and Game

267-2145

STATE OF ALASKA
DEPARTMENT OF FISH AND GAME

SARAH PALIN, GOVERNOR

ANILCA Program
333 Raspberry Road
ANCHORAGE, AK 99518
PHONE: (907) 267-2145
FAX: (907) 267-2442

June 22, 2009

Ms. Carrie McEnteer, Environmental Planning Branch Chief
U.S. Army Garrison Fort Wainright
Directorate of Public Works
1060 Gaffney Road #4500
Fort Wainwright, AK 99703-4500

Dear Ms. McEnteer:

The Alaska Department of Fish and Game (Department) reviewed the Draft Environmental Impact Statement Stationing and Training of Increased Aviation Assets within U.S. Army Alaska. The following are the consolidated comments from the Department concerning the three alternatives.

The Department is responsible for the management and sustainability of fish and resident wildlife populations on all lands in Alaska. This responsibility is recognized by the Department of Defense in the Sikes Act of 1960 (and subsequent related agreements), enacted to address wildlife conservation and public access on military installations.

The Department is supportive of the need by the US Army to conduct training activities related to the Nations defense. Alaska has historically provided extensive land areas where training by the military can be conducted in a realistic fashion for small and large units.

The EIS provides extensive information concerning potential impacts to public uses, wildlife and habitat. However, concerns exist about the level of potential impacts to public use, wildlife and habitat and the ability of the Department to fulfill its management responsibilities.

Impacts to Public use for Subsistence and Recreation

The EIS notes that alternatives 2 and 3 will have "less than significant adverse impacts" on subsistence and recreational use but does not provide specific information for substantiation. Increased closures, which are likely under both alternatives, could have significant impacts to subsistence and recreational users unless closures were carefully scheduled to avoid high use periods such as moose hunting and berry picking.

15-01

15-01, Subsistence and Recreation

U.S. Army Alaska has a primary mission to maintain and enhance the combat readiness of its Soldiers. However, within the military mission priority, U.S. Army Alaska strives to allow public access to military lands, providing both civilians and military personnel with subsistence and recreational opportunities. Access to the withdrawn lands is permitted by the Army when it does not impact military training and is not a hazard to public safety. U.S. Army Alaska will continue the process of coordination with the Alaska Department of Fish and Game and will specifically discuss the schedule of closures as they relate to high-use periods. Furthermore, U.S. Army Alaska will continue to implement the requirements of the Alaska National Interest Lands Conservation Act (ANILCA). For example, U.S. Army Alaska will work with relevant federal and State officials to protect local subsistence populations through priority for harvest when resources are reduced. Please see Subsections 3.11.1 and 4.11.3 for information on subsistence and recreation on military land and mitigation measures.

15-02	<p>particularly at the individual user level. We recommend close consultation with the Departments Divisions of Wildlife Conservation and Subsistence to determine these periods.</p> <p>Additionally, GMU 20A, where much of the lands effected by the EIS are located, was designated by the Alaska Board of Game for intensive management of moose to provide for increased human consumption. This designation and subsequent work to improve both habitat and predator-prey relationships to increase moose populations, attracts increased numbers of hunters seeking to take advantage of the increased moose population and harvest potential. We again recommend close consultation with the Department to determine the greatest public access and use of these areas for the public while also retaining them for use by the US Army for training purposes. This action would be consistent with the intent of the Sikes Act (16 USC 670) to allow public use of military installations.</p>
15-03	<p>Impacts to Wildlife</p> <p>The EIS suggests that increased military activity for alternatives 2 and 3 will have minimal effects on wildlife. The EIS needs to document that current activities and potential increased activity (noise, training) throughout the area will not negatively affect moose distributions, movements, condition (calf weights), productivity, and/or survival.</p>
15-04	<p>The Department has specific concerns that increased activities in the Donnelly Training Area will increase disturbance to the calving grounds of the Delta Bison Herd along the Delta River. Effects to the Delta Bison Herd can be mitigated by restricting flight activity in this area during May-July annually.</p>
15-05	<p>Additionally, it is also very important to maintain the current training restrictions during "critical" periods for wildlife such as, but not limited to, calving and nesting periods.</p>
15-06	<p>Impacts to Administrative Activities and Access and the Sikes Act</p> <p>The Department is concerned that both alternatives 2 and 3 will restrict our ability to conduct administrative activities and curtail access for management and research purposes within the subject areas. For example, the EIS suggests that restricted airspace will be activated more frequently. Since the Department accesses most wildlife resources in the Tanana valley solely by aircraft, this will make it much more difficult or nearly impossible to conduct necessary management and research activities.</p>
15-06	<p>Of particular concern is how new or increased military activities may influence the future of habitat manipulation, fire management and prescribed burns in the area. Early succession forests are the most productive habitat for many species of wildlife in interior Alaska, and suppressing or preventing wildfires is a common action when additional human activity is established in an area. The result is degraded habitat and wildlife populations that suffer from lack of habitat rejuvenation.</p>
15-06	<p>As an example of the Departments concerns, in June 2009, an experimental habitat manipulation project in the foothills of the Alaska Range, developed in conjunction</p>

15-02, Subsistence and Recreation

Impacts to wildlife due to increases in aviation personnel and other support personnel are discussed in Subsections 4.6.2.2.1 and 4.6.2.3.1. Also, please see the responses to comments 15-01 and 15-06.

15-03, Wildlife

The EIS summarizes the current knowledge on moose populations that would be affected by Alternatives 2 and 3 (see Subsections 3.6.3.1.1, 3.6.3.2.1, and 3.6.3.3.1) and evaluates the potential impacts from the proposed alternatives (Section 4.6). Proposed activities under Alternative 2 are similar to those currently occurring in the training areas and along the flight corridors; thus, any negative effects on moose would already have been evident if they were resulting from helicopter operations in the training areas. Monitoring of moose populations over the last few years (during temporary stationing of the Task Force) has indicated no change from previous herd health, reproduction, and movement; thus, no changes are expected from permanent stationing of the Task Force (as described under Alternative 2). Alternative 3 would result in increased overflights and use of the flight corridor between the DTA and Fort Richardson (FRA), but because that route is primarily over the developed highway system, impacts on moose would be minor (see Subsection 4.6.2.3). Under Alternative 3, the trips to FRA would be very infrequent and will not result in adverse population impacts, but rather only individual impacts. With funding support from U.S. Army Alaska, Alaska Department of Fish and Game conducts moose surveys during the winter and the calving season. The following language was added to Subsections 4.6.2.2.4 and 4.6.2.3.4: "If future monitoring results indicate that herd health, reproduction, or movement have changed, further assessment will be conducted to evaluate whether these changes are the result of training activities, including helicopters."

Please see the following pages for responses to comments 15-04 through 15-06.

Continued from letter on previous page.

15-04, Wildlife (comment on previous page)

As indicated in the EIS (see Subsection 3.6.1.2.2), the U.S. Army and State of Alaska have agreements in place that ensure that the Delta Bison Area has protective restrictions in place to reduce disturbance to calving and summering bison during critical periods. The Army minimizes activities between April 15 and May 15, and July 1 to August 31, and employs ground-training buffer zones (2,000 meters) for bison (see Subsection 4.6.2.2.4). Additional Army guidelines for other "critical" periods for wildlife are also discussed in the EIS (Subsection 3.6.1.2.2, Table 2.7.a, and Subsections 4.6.2.2.4, 4.6.3, and 4.12.4.5).

15-05, Wildlife (comment on previous page)

The U.S. Army notifies the public when flight restrictions are occurring in the training areas (Subsection 4.2.3) and will continue to work cooperatively with the Alaska Department of Fish and Game on administrative, research, and management activities. The U.S. Army intends to continue to work effectively with State and federal wildlife agencies under the existing Memorandum of Understanding among the U.S. Department of Defense, the U.S. Fish and Wildlife Service, and the International Association of Fish and Wildlife Agencies for a Cooperative Integrated Natural Resource Management Program on Military Installations (2006).

15-06, Fire Management (comment on previous page)

U.S. Army Alaska does not currently practice fire suppression in the training areas unless a structure is in danger. No new construction is planned for this project outside of the cantonment area, so there would not be a need for increased fire suppression with regards to this project. While the main purpose for U.S. Army lands is to train Soldiers, U.S. Army Alaska is committed to working with the Alaska Department of Fish and Game with regards to moose management on training lands.

15-07

with the Department of Natural Resources, was not conducted because of additional airspace restrictions required by a US Army training exercise. This action was a major setback in the Department's management of moose in Game Management Unit (GMU) 20A.

The Department requests assurance that wildfires and prescribed fires will be allowed to burn in this area, subject to reasonable administrative requirements such as an approved fire management plan. After decades of fire suppression by several forms of government, wildlife habitat in the area is in need of rejuvenation through fire. The Department is highly desirous of additional burns to provide more productive wildlife habitat.

Sikes Act

In recognition of the concerns identified here related to public use, wildlife and administrative activities, we recommend that the US Army commit to implementation of the Sikes Act and its subsequent step down agreement, the "Memorandum of Understanding among the US Department of Defense and the US Fish and Wildlife Service and the International Association of Fish and Wildlife Agencies for a Cooperative Integrated Natural Resource Management Program on Military Installations." (2006). The MOU guides the respective cooperating agencies concerning the conservation, protection and management of fish and wildlife resources on military lands through "Integrated Natural Resource Management Plans" (INRMPs). The implementation of an INRMP for this area with the Department would assist in identifying resource management and research needs for conservation purposes and the needs of the US Army for training purposes. The Department could also work with the US Army to help document the potential effects of current and increased activity.

15-08

The Department also requests the EIS recognize there will be a need for increased hunter education and wildlife law enforcement efforts in the area with the increase in military personnel and dependents. This is especially true for hunts that have proven to be popular with many military personnel such as bear and moose hunts. We encourage participation by all members of the public to utilize Alaska's wildlife resources but the potential increase of participants may have unintended effects related to crowding, displacement of current users, and unfamiliarity with Alaskan hunting regulations, requiring the additional efforts of education and enforcement.

The following Department staff are the designated points of contact for future correspondence concerning this EIS:

For biological related issues:

Don Young
Area Management Biologist, Division of Wildlife Conservation
Alaska Department of Fish and Game
1300 College Road
Fairbanks, AK 99701-1599
(907) 459-7233

15-07, Wildlife

U.S. Army Alaska understands the need for cooperation among all agencies responsible for management of wildlife and lands affected by activities outlined in this EIS. U.S. Army Alaska continues to be committed to fully abide by the referenced Memorandum of Understanding. U.S. Army Alaska maintains and implements *Integrated Natural Resources Management Plans* for all the posts covered by this EIS (i.e., Fort Wainwright and Fort Richardson and associated training areas) and has also completed and implements a state-wide *Ecosystem Management Plan* (see *Integrated Natural Resources Management Plan for U.S. Army Garrison Alaska Environmental Assessment*, 2007).

15-08, Subsistence and Recreation

Soldier education, as described in the response to comment T4-5, includes Newcomer Briefs for incoming Soldiers upon arrival to Fort Wainwright and Fort Richardson. Soldiers are encouraged to have respect for subsistence-user resources and to understand the value placed on the subsistence resources by the Alaska Native population. Adherence to hunting and fishing regulations is emphasized. They are instructed on private land ownership including Native corporation lands and individual Native allotments. Language was added to Subsection 3.1.2.8 of the EIS to provide additional information on the Soldier education program. Potential impacts related to subsistence and recreation from increased military and support personnel are discussed in Subsections 4.11.2.2.1 and 4.11.2.3.1. The Army is committed to developing and implementing a wildlife awareness program (please see Subsection 4.6.3.1).

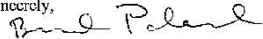
And for coordination of future planning processes:

Mr. Brad Palach
ANILCA Program Coordinator, Division of Sport Fish
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, AK 99518-1565

(907) 267-2145

The Department looks forward to the continued cooperation with the U.S. Army in addressing the resource, land management and training issues in the subject area.

Sincerely,



Brad Palach

cc: Roy Nowlin, Regional Management Coordinator, ADFG
Don Young, Area Management Biologist, ADFG
Tom Seaton, Wildlife Biologist, ADFG
Steve DuBois, Wildlife Biologist, ADFG
Dale Haggstrom, Wildlife Biologist, ADFG

From: Curtis.Jennifer@epa.gov
To: [McIntyre, Carrie L. Mc CTR USA IMCOM](#)
Subject: EPA comments on Army Aviation Reorganization DEIS
Date: Monday, June 22, 2009 4:16:25 PM
Attachments: 07-015-DOD DEIS Army Aviation Assets final.doc

Hello, Carrie.

Attached are our comments on the Army Aviation Reorganization DEIS. An original signature hard copy is being mailed from Seattle.

Thank you for the opportunity to provide comments.

(See attached file: 07-015-DOD DEIS Army Aviation Assets final.doc)

Jennifer Curtis, NEPA Reviewer/Compliance Coordinator
US EPA-Alaska Operations Office
222 West 7th Ave., #19
Anchorage, AK 99513
Phone: 907-271-6324
Fax: 907-271-3424
Email: curtis.jennifer@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

June 22, 2009

Ms Carrie McEnteer, Environmental Planning Branch Chief
US Army Garrison Alaska, Fort Wainwright
Directorate of Public Works
Attn: IMPC-FWA-PWE (McEnteer)
1060 Gaffney Road #4500
Fort Wainwright, AK 99703-4500

Subject: **Stationing and Training of Increased Aviation Assets, U.S. Army AK**
EPA Project Number: 07-015-DOD

Dear Ms. McEnteer:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Department of the Army (Army) **Draft Environmental Impact Statement (DEIS) for the Stationing and Training of Increased Aviation Assets within U.S. Army Alaska** (CEQ No. 20090136). Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The DEIS was prepared to evaluate the Army proposal to station increased aviation assets in Alaska through the creation of a new unit with increased capacity. This would involve the stationing of additional Soldiers and helicopters, constructing a number of facilities at Fort Wainwright and increasing aviation training on Army lands and within airspace in Alaska. Two action alternatives have been developed by the Army to address this proposal. Although not identified as such in the DEIS, the Army identified Alternative 2-Aviation Task Force as its Preferred Alternative in the May 1, 2009, Notice of Availability published in the *Federal Register*. EPA has based its review and rating on Alternative 2. We note that identifying the Preferred Alternative in the DEIS aids public and agency review.

We commend the Army's efforts to engage potentially impacted tribal governments and communities through its extensive consultation and public outreach activities. We also appreciate and support the use of valued environmental components for resource impact evaluation. We believe this approach makes sense and is appropriate given the resources that are included as such in the analysis. Finally, we support the Army's selection of Alternative 2 as its Preferred Alternative as it avoids potential impacts to sensitive resources in and around Fort Richardson and Elmendorf AFB, as well as minimizes impacts to air and water quality when compared to Alternative 3.

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16-01, Alternatives - General

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS. Your support of Alternative 2 has been noted.

16-02

We do have concerns regarding potential impacts to air quality, water quality, and historic resources, as well as potential conflicts with general aviation, however. We believe that additional analysis is needed to adequately evaluate impacts to air and water quality, and to clearly demonstrate conformity and to ensure that further degradation of an impaired water body (Chena River) will not occur. In addition, we believe that further information is needed to adequately discuss impacts to historic properties. We also believe that further information should be included in the FEIS regarding specific mitigation to ensure safety for general and Army aviation users. Currently, although impacts to general aviation are mentioned there is insufficient information on which to base the conclusion of minor impacts. Finally, we are concerned with construction and other activities in areas with both known and unidentified contamination. We do, however, appreciate the Army's recognition of the potential hazards encountered in such areas, and its reaffirmation of commitment to existing Federal Facility Agreements, CERCLA Records of Decisions (RODs) and Institutional Controls (ICs). In general, we support any measures that will avoid or minimize disturbance of these areas, as well as direct and indirect impacts to air and water quality, and other resources.

16-03

Based on our review, we have rated the Preferred Alternative EC-2 (Environmental Concerns, Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we used in conducting our review of the Draft EIS is enclosed for your reference.

We appreciate the opportunity to provide comments on the Army Aviation Assets Reorganization DEIS. If you have any questions regarding our comments, please Jennifer Curtis of my staff at 907-271-6324 or curtis.jennifer@epa.gov.

Sincerely,

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

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16-02, Alternatives - General

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS. Please see the responses to these individual comments below (16-04 through 16-13).

16-03, Alternatives - General

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS. The EC-2 rating has been noted and the responses to comments by the U.S. Environmental Protection Agency are provided in 16-04 through 16-13 to provide additional clarification and requested information.

EPA DETAILED COMMENTS ON THE ARMY AVIATION ASSETS
REORGANIZATION DRAFT ENVIRONMENTAL IMPACT STATEMENT

Air Quality and General Conformity

16-04 There is a modified version of MOBILE6 that was prepared for Fairbanks (see 67 FR 5067). EPA recommends use of this model in future evaluations because it is the regulatory model for CO in Fairbanks.

16-05 Although the assumptions used in the General Conformity and air emissions analyses appear appropriate, we do have concerns regarding the lack of clarity concerning indirect emissions for Eielson AFB. The General Conformity Analysis (Appendix D) for the Fairbanks area does not include the indirect emissions from Eielson AFB, which were discussed in the air quality analysis in Chapter 4 (Table 4.7.g). In conducting an applicability analysis, the Federal agency must determine whether the total direct and indirect emissions from the action are below or above the de minimis levels (see 71 FR 40420). We recommend further evaluation of the emissions calculations because if the indirect emissions from Eielson AFB (61.1 tons/year) were added to the table for Fairbanks area emissions (see table in Conclusions, Appendix D), the CO de minimis threshold of 100 tons/year would be exceeded. It is also not clear why the project would create much higher CO emissions at Eielson AFB compared to the other sites. We recommend further review and explanation regarding that level of emissions.

16-06 Also, while indirect emissions for Fort Richardson in the Anchorage area were included in the calculation, there are different emissions shown for helicopter activity between Appendix D and Chapter 4. Appendix D shows 1.3 tons/year CO emissions (see table on p. D-5) and Chapter 4 shows 5.55 tons/year CO emissions (see Table 4.7.j, p. 4-113). We recommend that this discrepancy be clarified and this information be included in the final EIS.

16-07 Finally, we recommend that the final EIS identify areas where CO emissions from vehicles and parking (29.3 tons and 21.0 tons) are being created to adequately evaluate problem intersections, for example identifying if the level of service is decreasing at any affected intersection. Once these affected locations are identified, appropriate mitigation should be considered. We recommend this information be included in the final EIS.

Water Quality

16-08 We believe that the DEIS does not fully consider impacts from stormwater runoff to the Chena River. As a 303(d) listed water body, and the main receiving body for runoff from Wainwright, EPA believes it is necessary for an evaluation of such impacts to be included in the EIS. The additional roads and structures proposed for construction under the Alternative 2 will create additional impervious surface (in areas not previously hardened with concrete), which should also be taken into account in your analysis. EPA believes that short-term (construction) and long-term (operations) impacts should both be evaluated, and a clear determination of compliance with the antidegradation requirements should be provided. If the Army cannot demonstrate compliance with the antidegradation requirements, additional mitigation should be included to prevent or minimize impacts that could cause degradation. We recommend that the Army work with the Water Quality Division of the Alaska Department of Environmental Conservation and EPA Region 10 Stormwater Program to determine what additional measures, if

16-04, Air Quality

As recommended, the Army will use the model in the future. Please see the response to comments 10-03 and 10-07.

16-05, Air Quality

Appendix D is a general conformity applicability analysis for the Proposed Action within the maintenance areas of Fairbanks and Anchorage. Under the U.S. Environmental Protection Agency's Revision to *General Conformity Applicability Question and Answers* memorandum dated June 5, 2006, "any direct and indirect emissions originating in an attainment or unclassifiable area do not need to be analyzed for general conformity purposes, even if such emissions may transport into a nonattainment or maintenance area." The emissions from vehicles at Eielson AFB noted fit this description because Eielson AFB is located in an attainment area. The 61.1 tons mentioned in Table 4.7.g are emissions resulting from all vehicles driving to Eielson AFB (from North Pole and Fairbanks) and from operations (including helicopters). It is assumed that approximately 12 percent of the Eielson AFB personnel would live within the Fairbanks maintenance area (i.e., approximately 12 percent of the increase in personnel stationed at Fort Wainwright as modeled for Alternative 3). The emissions resulting from their vehicle trips would add an additional 3 to 4 tons of CO per year and would not result in exceedance of the de minimis threshold. Table 4.7.g is used to illustrate the expected emissions of the entire Proposed Action. Table 4.7.j provides the helicopter emissions. Alternative 2 is the Preferred Alternative and does not include any assets being located at Eielson AFB.

Please see the following pages for responses to comments 16-06, 16-07, and 16-08.

Continued from letter on previous page.

16-06, Air Quality

Emissions from helicopter activity based on the number of takeoffs and landings and number of helicopters listed in Table 2.5.a of the EIS were reevaluated and updated in Appendix D of the Final EIS, and these revisions were also made to Section 4.7 of the Final EIS. As noted in the response to comment 10-05, there were minor increases in the overall emissions but no changes to the conclusions of the air quality analysis.


16-07, Air Quality

General conformity analyses are conducted for federal projects not defined as a transportation project. The Proposed Action does not include upgrades to or new construction of roadways or intersections. The general conformity analysis provided in Appendix D was conducted to assess if reasonably foreseeable and practically controlled emissions, direct or indirect, were close to or exceeding the de minimis levels. If the de minimis levels were exceeded, or if the Proposed Action were a transportation project, the incremental modeling and analysis would have been conducted through a comprehensive conformity determination. Question 25 of the EPA's General Conformity Guidance, Question and Answers, July 13, 1994, also states that de minimis traffic activity from federal actions would be tracked through the ongoing updates to the area's emission inventory and transportation model conducted by the Metropolitan Planning Organization. The Metropolitan Planning Organization is the Fairbanks North Star Borough, which updates the area's emission inventory and transportation model regularly and coordinates with the Army. Preliminary emissions data for the Aviation Task Force were included in the model for planning purposes.

Continued from letter on previous page.

16-08, Water Resources

The Alaska Department of Environmental Conservation (Department) was contacted to determine the status of its Total Maximum Daily Load (TMDL) Study on the Chena River. The parameters not meeting water quality standards in the Chena River are petroleum hydrocarbons, oil and grease, and sediment. The Department expects to issue the TMDL in 2010. Fort Wainwright (FWA) expects receipt of a new Multi-Sector General Permit for Industrial Activities. In anticipation of the permit, FWA updated its *Storm Water Pollution Prevention Plan*. FWA also anticipates issuance of a permit to operate as a small municipal separate storm sewer system. FWA is coordinating with the Department and the U.S. Environmental Protection Agency during the permit application review periods and will continue to work with the agencies during ongoing operation and implementation of the permit requirements. The Army requires that construction contractors obtain the necessary State permits. This information was added to Subsection 3.10.3.1 of the Final EIS. In addition, examples of BMPs for managing storm water runoff were included in Subsection 4.10.2.2.3. These include silt fencing during construction and use of oil-water separators for operation of uncovered areas such as vehicle and helicopter parking.

	any, should be taken to minimize impacts to the Chena, and to incorporate any proposed Total Maximum Daily Limit (TMDL) restrictions currently under development. We recommend that this information be included in the final EIS.
	Historic Properties and Resources The DEIS clearly identifies significant impacts to historic properties on Fort Wainwright. We are pleased that the Army is working closely with the Fairbanks North Star Borough Historic Preservation Commission and the State Historic Preservation Office (SHPO) on these issues. We recommend that any specific concerns identified in the NHPA 106 consultation process or in ongoing communication with the SHPO, and ultimately any additional mitigation commitments, be included in the final EIS. Also, if any archeological remains or cultural resources are identified during work to identify such remains and resources, we strongly recommend that the Army notify appropriate tribal governments immediately and work with them closely to ensure proper handling and disposition.
16-09	
	Contaminated Sites The DEIS also identifies known contaminated sites for which appropriate FFAs, RODs and ICs have been developed with the appropriate federal (EPA) and state (ADEC) agencies. The Army has made it clear that any changes to those decisions or agreements would necessitate further negotiation with EPA and ADEC to revise those agreements. We appreciate the acknowledgement of the possible need to revise agreements. We believe, however, that the final EIS should evaluate such potential scenarios involving needed changes to ICs and disclose any potential impacts associated with those changes. We also believe that commitments to on-going monitoring in areas where the presence of contamination is possible, but has not been identified previously, should be identified in the final EIS.
16-10	
	General Comments On several occasions, the DEIS states that the "study area" includes "all military locations" in Alaska. As several military sites were not included in the analysis, we recommend that these statements be changed to accurately reflect the actual study area used.
16-11	
16-12	Page 8-4 Tanacross is misspelled.
16-13	Page 8-2 Under EPA, contact information for Jacques Gusmano is incorrect. He is located in the EPA Alaska Operations Office in Anchorage.
	 Printed on Recycled Paper

16-09, Cultural and Visual Resources

At the time of publication of the Draft EIS, the Programmatic Agreement was in the developmental phases. However, the mitigation measures identified in the Draft EIS were based upon the ongoing discussion with the State Historic Preservation Officer and the other National Historic Preservation (NHPA) Section 106 consulting parties, including the National Park Service and the Advisory Council on Historic Preservation. For the Final EIS, Appendix F has been added that includes the Programmatic Agreement. The Programmatic Agreement is anticipated to be signed in August or September 2009 with only minor changes anticipated from the version provided in the Final EIS.

No archaeological surveys are planned prior to implementing the Proposed Action because construction and training will occur within previously surveyed areas, all of which have been disturbed by construction and/or training. Inadvertent discoveries of archaeological remains are addressed as mitigation in Subsection 4.3.3.6 of the Final EIS (SOP 12 of the Army's *Integrated Cultural Resources Management Plan*). SOP 12 does address the process for tribal coordination, when appropriate. Subsection 4.3.3.6 has been revised for further clarification.

16-10, Hazardous Materials/Hazardous Waste

When siting of facilities in a contaminated area is unavoidable, early and rigorous consultation between the Army, U.S. Environmental Protection Agency, and Alaska Department of Environmental Conservation would be completed prior to the start of new construction. Through this consultation process, funding requests for cleanup of contaminants, commitments to continued (or increased) environmental monitoring, and other required changes can be accomplished in accordance with the FFA.

(Response continued on following page.)

Responses to comments 16-11, 16-12, and 16-13 are on the following pages.

Continued from letter on previous page.

16-10 Continued from previous page

Since the Draft EIS was distributed, Pre-Construction Environmental Surveys (PES) were completed for the new construction projects associated with Alternative 2 that have the potential to be sited in contaminated areas (Subsection 4.5.2.2.3). Summaries of the PES conclusions were added to Subsection 4.5.2.2.3. The PES recommended approval for construction without additional investigation for all but the following two areas:

- Additional investigation for the Aircraft Parts Storage Facility will be conducted in the summer of 2009 to delineate and characterize the location and concentration of any contaminants with respect to layout and foundation design. The site was recommended for approval for construction because of the nature of the contamination and the Garrison's capability to manage contamination that may be encountered during construction.

- Known minor contamination, potential contamination, and other recognized environmental conditions present a strong suspicion that contamination would be encountered during construction activities for the demolition of Buildings 3011, 3475, and 3477, or subsequent construction of the Organizational Parking Area project. The extent of the potential contamination cannot be determined until demolition of Buildings 3475 and 3477 has occurred. It is expected that contamination will be localized and within the capability of the project and Garrison to manage. The site was recommended for construction with the understanding that further investigation will be necessary to determine the presence or absence of contamination and performed required cleanup/ remediation.

The Army is committed (Subsection 4.5.3) to ongoing monitoring in areas where the presence of contamination is possible but has not been previously identified.

16-11, Alternatives - General
The language in the EIS was revised to accurately reflect the study area.

16-12, Agencies and Persons Contacted
The spelling of the word was corrected.

16-13, Agencies and Persons Contacted
The text was revised as indicated.

Continued from letter on previous page.

From: Mary_Lynch@ak.blm.gov
To: McEnroe, Carrie L Bls CTR USA IMCOM
Subject: EIS Comments from AFS
Date: Wednesday, June 24, 2009 4:24:09 AM

Carrie - I'm still waiting for Tami's comments and have reminded her several times that the 22nd is the due date.

Would you prefer a more formal letter signed by the Alaska Fire Service Manager?

Here is what I have to date from the Aviation staff -

Regarding airspace management and Alaska Fire Service aviation use of Ladd Field:

AIRSPACE MANAGEMENT

Increased numbers of military aircraft and a corresponding increase in the activity level associated with the Army's training mission create a higher potential for conflicts in the Special Use Airspace (Military Operating Areas, Restricted Areas). Alaska Fire Service (AFS) often responds to fires and conducts our own training missions in these areas.

Historically, AFS has enjoyed excellent results in deconflicting this airspace by working with the Special Use Airspace Information Service provided by Eielson Range Control. Continued cooperation and coordination between AFS aircraft and Range Control is very important in assuring safe operations for both parties as activity increases.

USE OF LADD FIELD

Under Alternatives 2 and 3, AFS will experience an increase in the number of airfield operations (takeoffs and landings) by the Army here at Ladd Field. During heavy training periods, this increase has the potential to impact prompt response to wildland fires by AFS.

To date, Fort Wainwright Tower personnel have always understood our need to receive timely departure clearances when responding to fires, and have consistently prioritized our emergency operations to the greatest extent possible. In the future, the recognition of the potential conflicts and a continued dedication to cooperation will help facilitate rapid response by our firefighting aircraft.

Also under Alternatives 2 and 3, the Army will need ramp and hangar space for a significant number of newly assigned aircraft. During periods of high fire activity, AFS may host as many as 20-25 firefighting aircraft (ranging in size from a P-3 Orion heavy air tanker to a Cessna 206) in our area at the northeast corner of the field.

In the past, Fort Wainwright Airfield Operations has worked closely with

17-01, Airspace Management
Please see the response to comment T2-5.

17-02, Airspace Management
Please see the response to comment T2-5.

17-03, Alternatives - General
Please see the responses to comments T2-6 and T2-7.

the AFS Ramp Manager to assure that extra ramp space is available (sometimes including the entire North taxiway between taxiways Bravo and Alpha) when needed. It appears that provisions for parking and hangars for any new military aircraft are focused on the area near Hangars 2 and 3 at the southwest corner of the field, mitigating to some extent the potential for ramp space crowding. Maintaining the excellent cooperation that has existed between AFS and Airfield Ops will be vital to assure that the needs of both parties are met.

Mary Lynch
Planning and Environmental Coordinator
BLM, Alaska Fire Service
Phone: 907 356-5863


From: [Chris Storchok](#)
To: [McEntee, Carrie L. Ms CTR USA JMCOM](#)
Subject: FNSB draft EIS comment letter
Date: Wednesday, July 01, 2009 11:27:18 AM
Attachments: [Jim Whitaker 20090701 102909.pdf](#)
Importance: High

Hi Carrie,
As promised, attached is the comment letter from Jim Whitaker, Mayor
Fairbanks North Star Borough. Hopefully the letter makes the internal
review. The hard copy is being mailed to you today as well.
If you need anything else please let me know.

Thanks again,
Chris

Chris Storchok
Mayor's Office
Fairbank North Star Borough
Fairbanks, AK 99707

Ph 907-459-1351
Fx 907-459-1102



Fairbanks North Star Borough

809 Pioneer Road P.O. Box 71267 Fairbanks, Alaska 99707-1267 907/459-1300
 Fax 907/459-1102
 Email mayor@co.fairbanks.ak.us

Office of the Mayor

July 1, 2009

Ms. Carrie McEnteer
 Directorate of Public Works,
 Attention: IMPA-FWA-PWE
 1060 Gaffney Road, #4500
 Fort Wainwright, AK 99703-4500

RE: Draft Environmental Impact Statement Stationing and Training of Increased Aviation Assets within
 U.S. Army Alaska, April 2009

Attention: IMPA-FWA-PWE

18-01 The Fairbanks North Star Borough (FNSB) would like to take this opportunity to comment on the Draft Environmental Impact Statement for Stationing and Training of Increased Aviation Assets within USARAK (Alaska, May 2009) (DEIS).

The FNSB wholeheartedly supports the U.S. Army and its mission in Alaska and as such would welcome the permanent stationing of an Aviation Task Force and its personnel at Fort Wainwright. The FNSB would also welcome the stationing of a Combat Aviation Brigade split between Fort Wainwright and Eielson Air Force Base as either option would be beneficial to both the community and U.S. Army Alaska.

We are certain that the joint military training ranges and facilities located within the FNSB far surpass in quality and quantity those found in most locations within the Continental United States and Hawaii. The sheer size of the ranges allow for the use of live ammunition from all Army platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities for soldiers, sailors, and airmen within the United States. The FNSB is proactive in addressing military concerns and continues to lead the nation in our willingness and ability to ensure that the military can meet its training mission and readiness status.

The FNSB would like to address air quality issues mentioned within the DEIS to provide the Army with an update of FNSB activities that are underway to meet attainment of PM_{2.5} by April 2014.

18-02 The DEIS states on page 4-114, Table 4.7.k under both Alternatives 2 (Aviation Task Force) and 3 (Combat Aviation Brigade) that "Stationary source emission increases are below major and minor modification thresholds" and "the increase in CO, PM₁₀, SO₂, and VOC emissions would be below the 100-tpy threshold" thus not contributing to an increase in air pollution above the NAAQS, not contributing to an existing violation of the NAAQS, but the "Potential would remain to not meet attainment for PM_{2.5} by April 2014." The FNSB is working hard to meet PM_{2.5} attainment status by April 2014. Current FNSB efforts include:

- Draft PM_{2.5} Ordinance
 The FNSB Assembly and Mayor's Office are in the process of promulgating regulations restricting emissions of particulates from point sources that do not meet EPA standards.

18-01, General Support

U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS. Your support of the Army and both Alternatives 2 and 3 has been noted.

18-02, Air Quality

The entries in Table 4.7.k that state there is a potential to "...not meet attainment for PM_{2.5} by April 2014" were removed. The challenge to ensure attainment with the fine particulate standard while supporting communal and military growth is being addressed through significant cooperative effort by the Borough. The details concerning the Borough's efforts, as provided, were incorporated in Chapter 3 of the EIS.

Letter to Ms. Carrie McEnteer
 July 1, 2009
 Page 2 of 3

- *Change out Program to replace non-EPA complaint home heating devices*
 - *Property Tax Credit*
 The FNSB requested and received a state law change that will allow communities to offer a property tax credit for citizens who upgrade their home heating appliances to current EPA standards.
 - *Federal Income Tax Credits for Energy-Efficient Improvements to Existing Homes.*
 American Recovery and Reinvestment Act extends through 2010 tax credits for energy-efficient improvements to existing homes. Individuals were allowed a tax credit equal to 30% of the cost of qualified energy efficiency improvements for 2009 and 2010 capped at \$1,500 for each property.
- *Cold Climate Housing Research Center (CCHRC) "Reducing PM_{2.5} Emissions from Residential Heating Sources in the Fairbanks North Star Borough: Emission Estimates, Policy Options, and Recommendations" February 2009*
 The Climate Housing Research Center developed a model to estimate the baseline PM_{2.5} emissions from residential heating sources, and the PM_{2.5} emissions reductions caused by various policy options. CCHRC recommended a combination of policy options that will reduce PM_{2.5} emissions from residential heating sources from 874 tons/year to 422 tons/year, or 52%.
- *University of Alaska Geophysical Institute (GI) PM_{2.5} modeling study*
 The FNSB has a specific work product project with the GI to complete a detailed model of local sources of PM_{2.5}, how the particles disperse and what weather conditions lead to violations of Federal PM_{2.5} standards. The project will be completed by July of 2010 and will serve as a guide to achieve attainment status.
- *Alaska Department of Environmental Conservation (ADEC) has designated the FNSB as lead agency dealing with air quality issues within the FNSB*
 The FNSB has relied on the ADEC to control large stationary emission sources within the borough. Fort Wainwright and Eielson Air Force Base are regulated by ADEC. The division of responsibilities between ADEC and the FNSB is formalized in a Memorandum of Understanding (MOU), which is reviewed on an annual basis by both parties. The current MOU was adopted in April of 2008.
- *Introduction of natural gas for home heating and power production.*
 The FNSB, in partnership with the Fairbanks Economic Development Corporation (FEDC) and the Alaska Gasline Port Authority are working to bring natural gas to the FNSB to replace home heating oil, wood, and coal, all of which contribute to the PM_{2.5} non-attainment status. Natural gas also emits far less CO₂ per BTU and hence will reduce the community's greenhouse gas emissions. FEDC completed a comprehensive community study in February 2009 that identifies the best source of natural gas for the community as well as potential commercial/industrial and home heating use. This study is available at www.investfairbanks.com under the Interior Issues Council tab.

The FNSB Air Quality Division will assist the U.S. Army whenever possible with local permitting and compliance issues.

Letter to Ms. Carrie McEnteer
July 1, 2009
Page 3 of 3

Thank you again for the opportunity to offer comment on the *Draft Environmental Impact Statement for Stationing and Training of Increased Aviation Assets Within U.S. Army Alaska, April 2009*. The FNSB looks forward to continuing our productive relationship with the U.S. Army. The FNSB point of contact for this action is Sallie Stuvek, Acting Chief of Staff, sstuvek@co.fairbanks.ak.us, 907-459-1207.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Whitaker", with a stylized flourish at the end.

Jim Whitaker, Mayor

JW/cs-csm

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9.2 Comments Received from Agency, Public, and Tribal Meetings, and Army Responses

The following subsections are based upon comments received from the agency, public, and tribal meetings held to provide information and accept comments on the Draft EIS. Comments provided are excerpted from transcripts prepared by court reporters at the various meetings. Full copies of the transcripts are included in the Administrative Record. No comments were received during the May 18, 2009, Anchorage tribal meeting, the May 18, 2009, Anchorage public meeting, or the May 21, 2009, Delta Junction public meeting. The tables with comments and responses from the various meetings are organized as follows:

- Subsection 9.2.1, Comments from Agency Meeting, Anchorage – May 18, 2009
- Subsection 9.2.2, Comments from Agency Meeting, Fairbanks – May 20, 2009
- Subsection 9.2.3, Comments from Public Meeting, Fairbanks – May 20, 2009
- Subsection 9.2.4, Comments from Tribal Meeting, Fairbanks – May 20, 2009

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9.2.1 Comments from Agency Meeting, Anchorage – May 18, 2009

Agency Meeting, Anchorage – May 18, 2009

Comment	Response
<p>Page 1</p> <hr/> <p>U.S. ARMY ALASKA DRAFT ENVIRONMENTAL IMPACT STATEMENT STATIONING AND TRAINING OF INCREASED AVIATION ASSETS WITHIN U.S. ARMY ALASKA</p> <hr/> <p>May 18, 2009 1:00 p.m. Taken at: The Offices of CH2M HILL 301 West Northern Lights Boulevard, 6th Floor Anchorage, Alaska Reported by: Leslie J. Knisley Shorthand Reporter</p>	
<p>Page 9 and 10</p> <p>24 RICHARD VICKERY: How did you come 25 to the determination that it's going to be less 1 than significant as far as the impact on 2 aviation?</p>	<p>T1-1, Airspace The structure of the airspace would not change and the amount of special use airspace would not increase under either Alternative 2 or Alternative 3. The helicopters will use the same flight corridors that are currently used. The potential impacts are limited to increased U.S. Army Alaska helicopter activity in public airspace and in existing military airspace areas. U.S. Army Alaska will continue coordination with local civilian aviation interests and the U.S. Air Force to reduce potential conflicts in corridors used heavily by both military and civilian air traffic. Please see Subsection 4.2.2.4.</p>
<p>Page 10</p> <p>9 RICHARD VICKERY: Do you have a 10 certain amount of interaction with general 11 aviation in those areas?</p>	<p>T1-2, Airspace Yes, general aviation and helicopters use the same flight corridors and the same altitudes. The U.S. Army Alaska program of coordination with local civilian aviation interests and the U.S. Air Force will reduce potential conflicts in corridors used by both military and civilian air traffic. Please see Subsections 4.2.2.4 and 4.2.3.</p>

Agency Meeting, Anchorage – May 18, 2009

Comment	Response
<p>Page 13</p> <p>12 LT. COL. SCOTT BABOS: Okay.</p> <p>13 Obviously Alternative 3 is going to be a greater</p> <p>14 increase through the construction amount and</p> <p>15 long-term personnel.</p>	<p>T1-3, Socioeconomics</p> <p>Alternative 3 would have the greatest impact. Stationing of a Combat Aviation Brigade under Alternative 3 would result in 2,360 additional Soldiers and approximately 3.2 million square feet of construction. Stationing of the Task Force under Alternative 2 would result in 710 additional Soldiers and approximately 2.4 million square feet of construction. Estimated costs of planned construction for Alternative 2 would be approximately \$420 million over a 4-to-5-year period and the costs would be approximately 1.3 times greater for Alternative 3. Please see Subsection 4.8.2.</p>
<p>Page 13 and 14</p> <p>24 LT. COL. SCOTT BABOS: As far as</p> <p>25 the school system, doesn't the military pay per</p> <p>1 student to the school district?</p>	<p>T1-4, Socioeconomics (Schools)</p> <p>The U.S. Department of Education provides funding to the State of Alaska through the Impact Aid program to account for the loss in tax revenue for federally owned property, such as a military installation, which is exempt from local taxes. Information about the State of Alaska's funding for public schools, including disbursement of funds to local school districts received from the federal Impact Aid program, is published by the Alaska Department of Education & Early Development. A recent report regarding the funding of Alaska's public schools can be found at www.eed.state.ak.us/news/funding_program_overview.pdf.</p>
<p>Page 17</p> <p>4 LT. COL. SCOTT BABOS: Okay. Keep</p> <p>5 me straight. So then based off the comments that</p> <p>6 you get -- let's say based on the comments, that</p> <p>7 may drive you to go ahead and move to Alternative</p> <p>8 3. I mean, because right now you're saying your</p> <p>9 alternative is No. 2, so how would 3 ever come to</p> <p>10 fruition?</p>	<p>T1-5, Alternative 3</p> <p>The EIS evaluates the Proposed Action in the context of two separate action alternatives and the No Action alternative. These alternatives are evaluated equally as required by the National Environmental Policy Act (NEPA). The Army has identified Alternative 2 as the Preferred Alternative (see Section 2.8 of this Final EIS). If, in the future, Alternative 3 is determined to be an important component to Army transformation in Alaska, the issues and comments identified and addressed in this EIS will be considered, and the Army will determine if additional NEPA analysis is required.</p>
<p>Page 18 and 19</p> <p>17 LT. COL. SCOTT BABOS: Since you've</p> <p>18 done an EIS, when your final thing comes out --</p> <p>19 like I said, we deal with these people a lot. So</p> <p>20 you guys can do 2 now. Then let's say they come</p> <p>21 up here in the next few years; it works out</p> <p>22 great. You guys can turn around and say, now we</p> <p>23 want to take it up to the next level and we've</p> <p>24 already got an EIS done, and that will save you</p> <p>25 some time and money because you won't have to go</p>	<p>T1-6, Alternative 3</p> <p>If, in the future, Alternative 3 is determined to be a feasible and integral component to Army transformation in Alaska, the issues and comments identified and addressed in this EIS would be considered in the planning process. This EIS would likely then either be updated, revised, or adopted as the EIS for the stationing of a Combat Aviation Brigade. The applicability of this document to future actions would need to be considered by appropriate Army personnel.</p>

Agency Meeting, Anchorage – May 18, 2009

Comment	Response
<p>1 all the way back through the EIS. So you've 2 already done an EIS for No. 3.</p> <p>Page 19 and 20</p> <p>18 LT. COL. SCOTT BABOS: So if I'm -- 19 like I say, U.S. Air Force is obviously in 20 support of the Army, but from a civilian 21 perspective -- so let's say I'm in support of No. 22 2, so I'm not going to bother to write anything 23 in a comment because I don't think you're going 24 to go up to 3. The military, maybe the Air Force 25 too, the civilians are very concerned about how 1 we kind of do mission creep or we add on to what 2 we propose. So if someone -- you can encourage 3 people that if they're okay with proposed 4 Alternative 2 and they don't like No. 3, they 5 should still write comments about No. 3?</p> <p>Page 21</p> <p>10 LT. COL. SCOTT BABOS: So, 11 September approximately the ROD will come out. 12 So when would the Army start basing these -- are 13 we talking six months? 12 months? 18 months? 14 What's the lag time between -- obviously we'd 15 phase in over a period of time, but what's the 16 potential schedule?</p> <p>Page 22</p> <p>3 LT. COL. SCOTT BABOS: Are you 4 looking 12 months, 24 months that this would be 5 complete?</p> <p>Page 24</p> <p>1 ERIK JOHNSON: None of the EIS has 2 siting plans for the buildings or anything like 3 that?</p>	<p>T1-7, Alternative 3 Although the Army has identified Alternative 2 as its Preferred Alternative, the Army has not yet made the final decision in a Record of Decision. Therefore, the Army recommends that all comments should be submitted so that they may be considered in the decision-making process.</p> <p>T1-8, Other Army Issues Many of the helicopters and military personnel under Alternative 2 have been temporarily stationed at Fort Wainwright and have been training outside of Alaska or have been deployed abroad. Construction of new facilities to support Alternative 2 would start after the Record of Decision is signed, which is anticipated for September 2009. Construction would begin in 2010 and be finalized in 2014.</p> <p>T1-9, Other Army Issues Construction would begin in 2010 and be finalized in 2014.</p> <p>T1-10, Alternatives General Proposed construction and demolition at Fort Wainwright (FWA) under the two action alternatives would occur in the general vicinity of the airfield. Please see Figures 2.5.b and 2.5.c and Subsections 2.5.1.3 and 2.5.2.3, which provide further information on the planned locations for new buildings at Fort Wainwright (FWA).</p>

Agency Meeting, Anchorage – May 18, 2009

Comment	Response
<p>Page 24</p> <p>6 ERIK JOHNSON: General footprints.</p> <p>7 On the airfield?</p>	<p>T1-11, Alternatives General</p> <p>Proposed construction and demolition at Fort Wainwright under the two action alternatives would occur in the general vicinity of the airfield. Please see Figures 2.5.b and 2.5.c and Subsections 2.5.1.3 and 2.5.2.3.</p>

9.2.2 Comments from Agency Meeting, Fairbanks – May 20, 2009

Agency Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>Page 1</p> <p>STATIONING AND TRAINING OF INCREASED AVIATION ASSETS WITHIN U.S. ARMY ALASKA DRAFT ENVIRONMENTAL IMPACT STATEMENT MEETING</p> <p>May 20, 2009 Fairbanks, Alaska</p> <p>Page 15</p> <p>11 MAYOR WHITAKER: 14 My purpose today is to 15 have on the record that indeed those positive comments will be 16 forthcoming.</p> <p>Page 15 and 16</p> <p>11 MAYOR WHITAKER: 17 The Borough has a direct responsibility for air 18 quality within this region, and we are in the process of 19 building an air quality compliance plan with regard to 20 particulate matter that we are very confident will meet the EPA 21 air quality standards. Again, regarding particulate matter. 22 We do not see this project and this effort as being adverse to 23 that plan. In fact, we think that it is an essential component 24 to our overall plan that we have some growth component. This 25 provides some growth component for the community. We must have 1 economic viability in order to complete our plan.</p> <p>Page 16 and 17</p> <p>21 MR. NASON: But I was wondering how this plays, 22 or does it have any role in the ongoing PARC EIS, the Pacific 23 Alaska Range Complex? I know we've got a large EIS going on 24 that. I believe it's being held -- work primarily Elmendorf 25 and Fort Richardson. I don't know if there's some connection 1 between the two</p>	<p>T2-1, General Support U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS.</p> <p>T2-2, General Support The comment is noted. The Army has been working closely with the Fairbanks North Star Borough (FNSB) to achieve air quality compliance for the region, and will continue that coordination as FNSB develops its future plans.</p> <p>T2-3, Cumulative Effects The Pacific Area Range Complex (PARC) is in the preliminary stages of planning. Because the project details are not available, it was not considered a reasonably foreseeable action in the cumulative impact assessment. When the details of the PARC project become available, the Army will be an active participant in the EIS for that project. The Stationing and Training of Increased Aviation Assets within U.S. Army Alaska (this EIS) will be included as an action for cumulative effects analysis in the PARC EIS.</p>

Agency Meeting, Fairbanks – May 20, 2009

Comment	Response
Page 17	
21 MR. NASON: 2 And also there's an EIS going on. It mostly 3 seems to be the Alaska Railroad and their Northern Rail 4 Extension. And I don't know if -- and I'm asking the same 5 question on the other EISs if we're all taking all these things 6 kind of as a whole into consideration?	T2-4, Cumulative Effects The Northern Rail Extension project between North Pole and Delta was included in the cumulative impact assessment (Subsection 4.12.3). The alignment roughly parallels the Tanana River and intersects Eielson Air Force Base and the Donnelly Training Area, terminating south of Fort Wainwright and its training areas. An EIS has been prepared for this action. The Northern Rail Extension project was identified as having the potential to cumulatively affect wildlife and subsistence. Please see Subsection 4.12.4 for the Cumulative Impact Assessment.
Page 18	
6 MR. HOUDE: Chip Houde again, the BLM Alaska 7 State Aviation Manager, and my comments center on air space and 8 use of the airfield. We've had -- let me start off by saying 9 we've had a great cooperation in coordinating our emergency 10 response activities in the air space in the MOAs and the 11 restricted areas. Eielson Range Control has been a key to 12 that. 13 Also obtaining prompt clearances for our 14 emergency response. Larry Level (ph) and the tower folks have 15 recognized that getting us off the ground is very important, 16 and they've -- we've had a great cooperation there. We just 17 see that the increase number of operations could impact that. 18 And we just wanted to bring forward that this is not so much a 19 concern, but just an opportunity for us to increase our 20 coordination on those two issues.	T2-5, Airspace Management The structure of the airspace would not change and the amount of special use airspace would not increase. The helicopters will use the same flight corridors that are currently used. The potential impacts due to increased U.S. Army Alaska helicopter activity in public airspace is not expected to significantly impact emergency response. U.S. Army Alaska will continue coordination with other airspace users. Emergency responders will continue to be given priority over training exercises. Please see Subsections 4.2.2.4 and 4.2.3.
Page 18 and 19	
MR. HOUDE: 21 The other issue that's not really addressed in 22 the EIS, but I'd like to bring forward, is the issue of space 23 on the airfield. In busy fire seasons we can have 20, 25 24 aircraft on our little area down there on the north taxiway 25 between Bravo and Alpha. And again, airfield ops, Drew Prewitt 1 (ph), has worked really well with us to make sure that we have 2 enough space for our aircraft.	T2-6, Alternatives – General The proposed siting of facilities was developed with consideration of existing and future land uses and operations requirements. Proposed Blackhawk outdoor parking for both action alternatives is located west of Taxiway B and all other proposed parking areas and proposed facilities construction and demolition are located south of the airfield. No significant impacts to the Bureau of Land Management (BLM) operations are anticipated. Please see Figures 2.5.b and 2.5.c for the proposed siting of facilities associated with each alternative.

Agency Meeting, Fairbanks – May 20, 2009

Comment	Response
Page 19 MR. HOUDE: 3 And I understand that most of the construction, 4 the new construction for the -- if there are an increased 5 number of aircraft on post will be up by hangars 2 and 3. 6 Probably not an impact to us. But again, I just wanted to 7 bring it up, another opportunity for increased coordination 8 between the BLM and the Army.	T2-7, Alternatives – General The proposed siting of facilities was developed with consideration of existing and future land uses and operations requirements. Proposed Blackhawk outdoor parking for both action alternatives is located west of Taxiway B and all other proposed parking areas and proposed facilities construction and demolition are located south of the airfield. No significant impacts to the BLM operations are anticipated. Please see Figures 2.5.b and 2.5.c for the proposed siting of facilities associated with each alternative.
Page 20 and 21 18 COLONEL BARKER: Colonel Randy Barker with the 19 611th Air Support Group at Elmendorf. Do you have an 20 anticipated time frame for the Army's basing decision itself? 1 COLONEL BARKER: That's when the DA should make 2 up their mind at that point?	T2-8, Other Army Issues It is anticipated that the Army will have the Record of Decision signed by September 2009.
Page 21 18 MR. NASON: Okay. This is maybe a little -- 19 Mac Nason again. Should Alternative 2 or 3 -- and this is 20 purely because we've got work going on, and we're competing for 21 the same contractors and work horses. You're looking at a 22 potential of 460 million in MILCON? 23 COLONEL JONES: Yes. 24 MR. NASON: It is MILCON not SRM? 1 MR. NASON: Okay. With an estimated, if the 2 money materializes, starting next season.	T2-9, Other Army Issues Funding for the Proposed Action would come from MILCON, not SRM. Construction for Alternative 2 would be in four phases and the cost for each phase would be \$125 million, \$161 million, \$111 million, and \$61 million, respectively. It is anticipated that there would be an additional \$30 million for a Kiowa warm storage facility; however, this is not definite. Alternative 3 would include these costs as well as additional costs that have not currently been planned.
Page 22 1 MR. NASON: Okay. With an estimated, if the 2 money materializes, starting next season. 17 MR. NASON: Now, that's based on Alternative 2, 18 right?	T2-10, Other Army Issues Construction of Alternative 2, if chosen, would begin in 2010 and be completed in 2014.

9.2.3 Comments from Public Meeting, Fairbanks – May 20, 2009

Public Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>Page 24</p> <p>STATIONING AND TRAINING OF INCREASED AVIATION ASSETS WITHIN U.S. ARMY ALASKA DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC COMMENTS</p> <p>May 20, 2009 Fairbanks, Alaska</p> <p>Page 24 through 26</p> <p>5 MR. HAGGLAND: I'm Pete Haggland 6 H-a-g-g-l-a-n-d, of the -- president of the local chapter of 7 the Experimental Aircraft Association. And I've been a pilot 8 for 50 years here in the Fairbanks area. And over the many, 9 many years I've watched a lot of things come and go. 10 And I'm concerned with the additional aviation 11 assets in the Fairbanks area, and also through some of the 12 other parts up there based at Eielson or Fort Wainwright or 13 Fort Richardson even. There's a cumulative impact with all of 14 the various traffic in the corridor between Fairbanks and 15 Big Delta and potentially between Fort Richardson and up 16 through the Gulkana area and on up into the Delta area for the 17 training deal. 18 And I'm also a member of the ACMAC Committee, 19 which is the Military Airspace Users Group. We have looked at 20 all the temporary MOAs and, you know, the individual restricted 21 areas and MOAs, and everything individually don't mean an awful 22 lot. You know, one can work around one or two or -- we're in 23 the process now. 24 We have all sorts of temporary MOAs in the 25 Big Delta area during the Air Force exercises we have. The 1 restricted area, the 2202s A, B's, and C's to the south. And 2 we have the corridor through there for the VFR traffic, 3 civilians and everything, which is really, really getting 4 restricted. And there's going to be a conflict sometime there 5 between the -- some of the different assets in the area</p>	<p>T3-1, Airspace Management (addressing all three comments)</p> <p>The structure of the airspace would not change and the amount of special use airspace would not increase. The increase in helicopter activity in the VFR flight corridor is addressed as a direct impact as summarized in Subsection 4.2.2.4. The potential cumulative effect of other past, present, and reasonably foreseeable federal actions on airspace management is described in Subsection 4.12.4.1, which notes that few of these actions would involve the use of VFR corridors where conflicts with general aviation would be more likely. The U.S. Air Force and Army actions involve aircraft flying at different altitudes and, therefore, do not contribute to cumulative congestion. The proposed conversion of the Delta TMOA to a permanent MOA is the only action that might also affect the same airspace as the Proposed Action. The cumulative effects of these actions would not significantly reduce airspace safety, predictability, or accessibility.</p>

Public Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>6 creating a hazard. And unfortunately I can kind of see that 7 there's potentially a hazard there for losing some people, 8 equipment, and lives. 9 And I think that we're -- we need to address 10 the overall situation for the airspace use. The 2202 areas 11 down there and everything were designed to, you know, 12 accommodate in the late forties, early fifties for the test 13 range at Greely, and also the military training grounds. And 14 the modern day equipment is just -- is way beyond what was 15 originally envisioned for those areas. 16 And I think we need to take a long-term look at 17 the cumulative impacts and see if we can't provide some relief 18 to that corridor. It's one of the few corridors that you can 19 transit to -- from the border area on up through and through 20 the Tok and eastern Alaska. 21 So I've been -- had some interesting 22 experiences over the years in that, and then also the -- 23 talking with the ACMAC people and briefing them on things that 24 are going on in terms of minerals and everything else. So I 25 think that the cumulative impact needs to be looked at between 1 the -- both the Air Force and the Army, additional assets. 2 You know, we have UAVs now going and 3 everything, and I know the rules are pretty strict on that. 4 But a very valid concern, I think, for the cumulative impact of 5 everything. 6 And I'd like to thank you for the time. I 7 think I represent about, oh, 80, 85 people in the Experimental 8 Aircraft Association Group. And most are not too much in favor 9 of increased traffic and the restrictions going on down in 10 that -- through the areas. So thank you again.</p>	<p>Please see the response to comment T3-1 on previous page.</p>

Public Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>Page 26 and 27 (T3-2)</p> <p>MR. HOPKINS: Sure. My name is Luke Hopkins. 14 L-u-k-e H-o-p-k-i-n-s. And I am an elected official to the 15 Fairbanks North Star Borough Assembly. I am here speaking as 16 an individual assembly member, not representing the body as a 17 whole. 18 I would like to speak in favor of Alternative 3 19 being considered. The additional construction facilities are 20 somewhat minimal compared to Alternative 2, and I feel that the 21 additional -- both helicopters and soldiers considered for the 22 Combat Aviation Brigade would, of course, be a very noteworthy 23 addition to our local economy. The Army base, I believe, can 24 expand, and also is -- in conjunction with Eielson Air Force 25 Base being able to accommodate this Combat Aviation Brigade. 1 The issues with the Fairbanks North Star 2 Borough having the nonattainment boundary for air quality, that 3 is being addressed and will be addressed, I believe, by the 4 time this increase in troop level occurs, and in terms of a 5 plan being put forward, and an attainment plan being put 6 forward for the Environmental Protection Agency to consider as 7 the appropriate method to address our air quality. 8 The strength of having the military increased 9 in Alaska is paramount to the considerations in the global 10 arena. The ability to move these, either the task force or the 11 brigade out from Central Alaska to points in the world is known 12 to be a very accessible route for a short time turnaround. 13 In closing, I feel that the community, as I 14 said, can assist in accommodating the additional troops. Also, 15 the housing, both on base and off base, would be available. 16 And any further buildup in the community, of course, would be 17 supportive of the local home builders or home builders that 18 would also be awarded contracts. 19 Thank you very much for this opportunity to 20 comment.</p> <p>Page 27 and 28 (T3-3)</p> <p>23 MR. HOPKINS: Luke Hopkins again, Fairbanks 24 North Star Borough Assembly member. Further comments on both 25 Alternative 2 and 3, and speaking specifically of</p>	<p>T3-2, Alternative 3 Thank you for your comment. The Army has noted your support of Alternative 3. Section 2.8 of this Final EIS outlines the rationale for the Army selecting Alternative 2 as its Preferred Alternative. However, the formal decision regarding whether Alternative 2 or Alternative 3 will be selected will not be made until the Record of Decision is signed, which is scheduled for September 2009.</p> <p>T3-3, Alternative 3 Thank you for your comment. U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS.</p>

Public Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>1 Alternative 3. 2 The local government, Fairbanks North Star 3 Borough, has provided funding to ensure that modeling for the 4 training area, the airspace training area, which is, I believe, 5 the largest in North America being available to the military, 6 has produced a super computer modeling program that assists the 7 pilots in that practice zone. 8 And also, the concern that the local government 9 puts forth in ensuring that this world class training ground is 10 available both for land troops and air support. And it is 11 something that certainly needs to be strongly considered, both 12 for winter and summer use. 13 And, of course, we have the minimum number of 14 training activities currently through the year, and we can 15 certainly expand that and make it available if the Alternative 16 3 is explored and determined to be located in the Interior of 17 Alaska. Thank you.</p> <p>Page 28 through 30</p> <p>20 MR. LANDRY: My name is Larry Landry, 21 L-a-n-d-r-y. My address is 2240 Railroad Drive, Fairbanks, 22 99709. I have a couple comments. 23 One concerns air quality. It says in the 24 Executive Summary that you handed out that there would be -- 25 that the emissions from -- that increased vehicle emissions in 1 operation of new stationary sources that emit air pollutants 2 would occur under both alternatives, and the emissions would 3 not effect ambient air quality. 4 I find that hard to believe. 700 new people 5 and families is a lot more vehicles, as well as the associated 6 things they're doing on base, and it seems inevitable to me 7 that there's going to be increased air quality issues. I think 8 it's really important that the EIS address this fully. 9 And I think we got to look at it -- and they 10 showed us the EIS at the hearing, and I looked at Appendix C. 11 It was hard to tell, but it looked like it didn't include, in 12 the analysis, just soldiers traveling around when they're off 13 duty. It seemed like it included when they're on duty. But 14 the fact is these people are going to be coming to Fairbanks</p>	<p>T3-4, Air Quality</p> <p>The EIS addresses the increase in military personnel and their families. The analysis includes vehicle traffic to and from Post and estimates emissions from the increase in proposed stationary sources as well as increased construction activity. Please see the conformity memorandum in Appendix D. The worse-case year, which is all construction and personnel for Alternative 3, is the largest increase and involves all proposed locations. The emission levels in this worse-case year were below threshold values established by the federal government to determine significant impacts. Therefore, the conclusion was drawn that no significant impact to overall air quality is expected. The EIS conservatively addresses all the emission sources in which the Army has direct control. In addition, within the Fairbanks Transportation Control Program of the State Air Quality Control Plan Section III.C, 2008, the probability of continued compliance is stated as greater than 95 percent through 2015 (ADEC, 2008c). This analysis accounts for a steady population growth, and predicts a decrease in CO emissions due to new vehicle emission standards, and programs such as vehicle I/M testing. The CO maintenance plan and the future PM_{2.5} maintenance plan will continue to ensure compliance with ambient air quality standards for all vehicle-related activities within the Fairbanks North Star Borough that are not related to direct military activity, such as shopping and recreational vehicle activity.</p>

Public Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>15 and living in Fairbanks, and that means a whole host of 16 activities.</p> <p>17 And I think that the analysis needs to look at 18 everything that they're going to do. As we know, Fairbanks has 19 really bad air quality, and it's something that we're working 20 to address. And so I think this is a real important issue that 21 the EIS, the military, and the EPA need to address and make 22 sure that somehow we're dealing with it constructively. 23 And the same thing on cumulative effects. It 24 seems like that kind of the cumulative effects or everything 25 that's happening on Eielson as it relates to the air quality 1 issue and this addition that it is a significant cumulative 2 effect that the EIS should address.</p> <p>3 A second concern is just the thought that 4 there's going to be a lot of live exercises, that that's a -- 5 and I know there's already a lot there. But it's just a lot of 6 lead and other metals being fired at the ground. And I learned 7 recently that when you shoot a moose -- I think especially a 8 moose because it's got big ribs, but I think other animals as 9 well, that there are lots of tiny little pieces of lead that go 10 all over the animal, that you're getting lead.</p> <p>11 And what happens when bullets hit the ground? 12 I mean, do they send lead spray flying a long ways? What are 13 the impacts of that? And what are the effects of all that lead 14 in the environment. Because lead is a -- as we know, it's a 15 dangerous compound. So I think that's it. Thank you.</p>	<p>T3-5, Air Quality Please see response for T3-4.</p> <p>T3-6, Air Quality Please see response for T3-4.</p> <p>T3-7, Hazardous Waste The ultimate fate of a bullet, or munition, depends on the type. Typically, non-explosive small-arms munitions (or bullets) remain intact after they have been fired down range. Other military explosive munitions explode upon impact and distribute very minute amounts of chemical constituents, and depending on type of munition, metal associated with shrapnel or bullet casings. Explosive munitions are only allowed to be used within existing areas designed by the Army as "impact areas." The public is restricted from accessing these areas. The term "munitions constituents" refers to any material originating from fired munitions, unexploded ordnance, discarded military munitions, or other military munitions. This includes explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions [10 U.S.C. 2710(e)(3)]. The primary components (over 97 percent by weight) of mortar and howitzer munitions are explosives, iron (steel), copper, and aluminum. The remaining components (2-3 percent) are other compounds that comprise only 43 grams (0.095 pounds) in the 81-mm mortar and 143 grams (0.31 pounds) in the 105-mm howitzer. The projectile body is the only part of the munitions that lands in the impact area and it is typically made of steel or iron. Many of the rounds have copper alloy rotating bands, and the fuzes and fins are made of aluminum.</p> <p>The munitions also contain trace amounts of other metals such as zinc, manganese, nickel, chromium, and cadmium that are generally components of steel or iron alloys. For instance, chromium and nickel are common additives to stainless steel that enhance corrosion resistance. Other</p>

Public Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>Page 30 and 31 (T3-8)</p> <p>18 MR. MULFORD: My name is Robert Mulford. It's 19 M-u-l-f-o-r-d. Okay. Having been following for the last 20 several years the transformation of the military and the 21 military doctrine, I've read several articles -- government 22 documents like the Joint Operations Environment and the 23 Capstone Report for Joint Operations. 24 It appears that the United States's military's 25 doctrine and the purpose of the military is to be prepared to 1 be utilized in various parts of the world. And according to 2 these government documents was to enhance the continued expanse 3 and progress of globalization. 4 And these documents also say that the 5 globalization is misunderstood by some peoples and they're not 6 as sophisticated as us in the West, in particularly the 7 United States, so they resort to violence and religious 8 fanaticism, et cetera, and we need our military to go there and 9 suppress such activities. 10 Well, I have problems with capitalism and 11 globalism myself, and I -- and the real problem I have is 12 General Eisenhower warned us about the military industrial 13 complex and its influence on our society and our economy. And 14 I'm really concerned with expanding globalism by use of the 15 military and use of my home state as a staging ground in doing 16 so. And in the process making my community more addicted to, I 17 guess is a good word to say, to the influence of the military 18 on our economy, making it ever so less possible to really 19 realize world peace because it's more -- and militarism has 20 become such an important contribution to our economic life. 21 Thank you.</p>	<p>compounds, such as waxes and silicon, represent just a few grams of the overall weight of munitions. During a detonation, the metals are discharged as shrapnel and essentially everything else is consumed.</p> <p>Munitions are not moved off-range during clearance operations, and unused munitions are disposed of in conformity with regulatory policies.</p> <p>T3-8, General Opposition U.S. Army Alaska appreciates you taking the time to comment on the Draft EIS and has noted your opposition to the Proposed Action. The general missions of the Army include providing protection for the United States and its interests by securing its airspace, land, and sea interest and jurisdictions; providing support to civil authorities s in order to provide the protection and support needed to sustain the United States' national interest and stability; providing support during national emergencies by assisting civil authorities in maintaining emergency preparedness throughout the nation; and working in concert with the three other major branches of the U.S. military. The mission of U.S. Army Alaska is to command and control Army forces in Alaska and to be capable of rapid deployment from Alaska in the conduct of contingency operations worldwide as directed. The purpose of the Proposed Action is to enhance U.S. Army Alaska aviation capabilities, improve training opportunities for existing U.S. Army Alaska forces, and improve the Army's ability to support worldwide military operations.</p>

9.2.4 Comments from Tribal Meeting, Fairbanks – May 20, 2009

Tribal Meeting, Fairbanks – May 20, 2009

Comment	Response
<p>Page 1</p> <p>2 U.S. ARMY GARRISON FORT WAINWRIGHT AND 3 FORT RICHARDSON (USAG-FWA and FRA) 4 STATIONING AND TRAINING OF INCREASED 5 AVIATION ASSETS WITHIN U.S. ARMY ALASKA 6 DRAFT ENVIRONMENTAL IMPACT STATEMENT 7 TRIBAL COMMENT MEETING</p> <p>12 May 20, 2009 Fairbanks, Alaska</p> <p>Page 6</p> <p>MR. ALBERT: 22 what 23 areas are these forces going to be training?</p> <p>Page 7</p> <p>5 MR. ALBERT: Was it a -- I think it was about a 6 week or so ago, to my surprise, I seen three big planes flying 7 the Northway area. I don't know if they came from here or 8 Anchorage. I was standing around, what are they doing?</p> <p>Page 8</p> <p>2 MR. ALBERT: The helicopters won't go -- 3 will just stay in specific areas, huh?</p> <p>Page 8</p> <p>13 MR. ALBERT: And you said something like 2,300 14 or something, military personnel?</p>	<p>T4-1, Alternatives – General The Proposed Action would use the military installations and flight corridors currently used by U.S. Army Alaska. There would be no change to flight corridors, airspace, or land areas. The flights will be originating from Fort Wainwright Main Post Ladd Army Airfield. The training areas include the Tanana Flats Training Area, Yukon Training Area, Donnelly Training Area East and West, Gerstle River Training Area, and the Black Rapids Training Area. Please see Section 2.2.</p> <p>T4-2, Alternatives – General These aircraft are not associated with U.S. Army Alaska training or the Proposed Action, which would only include the use of helicopters. The types of aviation assets (helicopters) that would be used for each alternative are described in Subsections 2.5.1.2, 2.5.2.2, and 2.5.3.2. The Army will forward these concerns to the U.S. Air Force.</p> <p>T4-3, Alternatives – General The Proposed Action would use the military installations and flight corridors and training areas that are currently in use by U.S. Army Alaska. The flight corridors are shown in Figures 2.2.b and 2.2.c, and the training areas are shown in Figures 2.3.b, 2.3.c, 2.3.d, and 2.3.e.</p> <p>T4-4, Alternative 3 Under Alternative 3, there would be an additional 2,360 Soldiers. Most of the additional personnel (60 percent) would be stationed at Fort Wainwright. The remainder would be stationed at Fort Richardson and Eielson Air Force Base. Section 2.5 provides a detailed description of the alternatives.</p>

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Comment	Response
<p>Page 9</p> <p>MR. ALBERT</p> <p>2 whenever new</p> <p>3 military personnel come into Alaska, you know, we recommend</p> <p>4 that, you know, they be aware, you know, of the tribes, you</p> <p>5 know, our activities.</p>	<p>T4-5, Environmental Justice</p> <p>Soldiers are educated on Alaska Native cultural awareness and diversity. This includes Newcomer Briefs for incoming Soldiers upon arrival to Fort Wainwright and Fort Richardson. Soldiers are encouraged to have respect for subsistence-user resources and understand the value placed on the subsistence resources by the Alaska Native population. They are informed that tribes are concerned with the stress that increased military population numbers can place on resources. Soldiers are told what constitutes waste of hunting harvest in different cultures and are encouraged to donate excess harvest to tribal entities. Adherence to hunting and fishing regulations is emphasized. They are instructed on private land ownership including Native corporation lands and individual Native allotments. Resources are given to Soldiers to foster the research of land ownership to avoid trespass. Language will be added to Subsection 3.1.2.8 of the EIS to provide additional information on the Soldier education program regarding Alaska Native concerns.</p>
<p>Page 10 and 11</p> <p>23 MR. ALBERT: It's just because that, you know,</p> <p>24 probably most of them, Alaska is new to them.</p> <p>25 COLONEL JONES: Right. Right.</p> <p>1 MR. ALBERT: And, you know, we're a whole</p> <p>2 different state than the rest of the states.</p> <p>3 COLONEL JONES: Right.</p> <p>4 MR. ALBERT: And we, as Native people, we</p> <p>5 heavily depend on our land and our wild game. Just to let you</p> <p>6 all know, you know, that this is one way -- one important way</p> <p>7 that we survive.</p>	<p>T4-6, Environmental Justice</p> <p>Please see the response to comment T4-5 above.</p>
<p>Page 13</p> <p>23 MR. ALBERT: Is this just temporarily or -- you</p> <p>24 know, I see 2,360. So you just need more helicopters. Is</p> <p>this</p> <p>25 temporarily for training?</p>	<p>T4-7, Alternatives – General</p> <p>The Proposed Action would be the permanent stationing of additional Soldiers and helicopters, construction of a number of facilities in U.S. Army Alaska cantonment areas, and increased aviation training on Army lands and within airspace in Alaska. The number of additional assets and Soldiers varies by alternative and are discussed in Section 2.5. In general terms, Alternative 2, stationing of an Aviation Task Force, would result in 710 additional Soldiers and 40 additional helicopters. Alternative 3, stationing of a Combat Aviation Brigade, would result in an additional 2,360 Soldiers and 84 additional helicopters.</p>

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Comment	Response
<p>Page 15 and 16</p> <p>MR. ALBERT:</p> <p>20 Unit 12 is no restrictions on our moose. We get a lot of, you</p> <p>21 know, in-state hunters that, you know.....</p> <p>2 MR. ALBERT: Unit 12 is our management. We do</p> <p>3 get a lot of military personnel up there that like big game.</p> <p>4 At the time a lot of our -- the thing is that, you know, about</p> <p>5 corporate lands, the lands that we own. And we're a lot</p> <p>6 stricter now. We do run them off.</p> <p>Page 26 and 27</p> <p>MR. ALBERT: 24 I know</p> <p>25 that you guys are doing your job to educate them, but, you</p> <p>1 know, you can't go out there and do what they're doing and</p> <p>2 expect them, you know, to follow through.</p> <p>Page 33</p> <p>11 MR. ALBERT: You know, at times, you know, we</p> <p>12 do need it in our villages. You know, we would take anything</p> <p>13 that you all would be able to give to us. Because in the</p> <p>14 winter months, you know, we have activities, and we and have</p> <p>15 dinners, you know. And most of the families, you know, like</p> <p>16 myself, you know, Harold, and my sisters, there's a bunch of</p> <p>17 them down in Northway, you know, we got to dig in our</p> <p>freezers,</p> <p>18 you know, to take out our personal meat, you know, to have</p> <p>19 dinners and everything.</p> <p>20 And it would be nice that, you know, the</p> <p>21 hunters would, you know, if they can't take it all, to contact</p> <p>22 the office and say, hey, you know, we got some meat here, do</p> <p>23 you want to come and pick it up. You know, you'll see anybody</p> <p>24 there really quick.</p>	<p>T4-8, Environmental Justice</p> <p>Please see the response to comment T4-5 above.</p> <p>T4-9, Environmental Justice</p> <p>Please see the response to comment T4-5 above. In addition to the Soldier education program described in the response to comment T4-5, the Army will ensure the existence of full-time Native tribal coordination within U.S. Army Alaska to address issues of importance to the Native community. This includes government-to-government relations with Alaska's Native tribes; fostering continued communication and coordination between the Army and the tribes; and working with relevant federal and State officials to protect subsistence resources in and around Army lands.</p> <p>T4-10, Environmental Justice</p> <p>Please see the response to comment T4-5 and T4-9 above.</p>