

CHAPTER 9

COMMENTS AND RESPONSES

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CHAPTER 9

COMMENTS AND RESPONSES

9.1 INTRODUCTION

This chapter contains the Army's responses to comments received on the Draft Environmental Impact Statement (EIS) for the transformation of U.S. Army Alaska (USARAK). A summary of the public comment process is presented in Section 9.2. An overview of government-to-government consultation is presented in Section 9.3. Comment letters and verbatim transcripts from the public, federal and state agencies, and USARAK government-to-government meetings with Alaska Tribal entities are reproduced in Section 9.4. The Army's responses to comments are also located in Section 9.4. Publications cited in the responses can be found in Chapter 6, Bibliography.

Each response was categorized by topic. Topics were then numbered in order as they appear in the document, resulting in each response having its own topic/number code. In Section 9.5, the responses are indexed by topic (9.5.1) and by commentor (9.5.2). This process resulted in 240 coded responses.

Table 9.1.a Topics Used in the Comment/Response Process.

Topics	
Air Quality	Human Health and Safety
Airspace and UAV	Infrastructure
Alternatives	Maneuver Impacts
Cultural Resources	Noise
Cumulative Impacts	Other
Donnelly Range EA	Public Access and Recreation
Environmental Awareness	Purpose and Need/Proposed Action
Environmental Consequences	Socioeconomics
Environmental Justice	Subsistence
Fire Management	Surface Water
Fort Richardson Fence	Wetlands
Geology and Soils	Wildlife and Fisheries
Groundwater	

9.2 SUMMARY OF PUBLIC COMMENT PROCESS

The Notice of Availability (NOA) for the Transformation EIS was published in the Federal Register on July 7, 2003. Announcements were placed in local newspapers including the *Anchorage Daily News*, *Delta Wind*, and *Fairbanks Daily News-Miner*. Approximately 1,800 copies of the Draft EIS were sent to people who had expressed interest in the Transformation EIS or other recent issues related to Army activities in Alaska and to community libraries throughout the project area.

The public comment period began July 7, 2003, and ended Sept. 9, 2003, for a total of 65 days. Verbal comments were recorded at public hearings held in Anchorage, Fairbanks, and Delta Junction. A total of 38 written comments were received. Two were from federal agencies, five from state agencies, four from local governments, three from Tribal representatives, two from special interest groups, and 22 from individuals.

Public hearings were held in three communities in Alaska: Anchorage (August 12, 2003), Fairbanks (August 13, 2003), and Delta Junction (August 14, 2003). Some individuals chose not to register. Total attendance was higher in Anchorage and estimated at 35 people. Five people were present in Delta Junction and 24 in Fairbanks. The format included a poster session that described transformation, alternatives considered, and impacts to the respective resources or issues. Briefings were provided by USARAK officials at 1:00 pm, 4:00 pm, and 7:00 pm at each location. Each briefing was followed by a question and answer session. See Appendix I for a summary of the briefings.

All comment letters and hearings transcripts were analyzed for their content and the different perspectives they offered. Where comments presented new, substantive information or ideas that warranted changes, the text of the Draft EIS was revised accordingly. Reference to the revised sections is made in the response to specific comments. Some comments did not require a response or change to the Draft EIS. These expressions of opinion or preference were noted.

9.3 GOVERNMENT-TO-GOVERNMENT CONSULTATION

Executive Order (EO) 13175, *Consultation and Coordination with Indian Tribal Governments*, directs federal agencies to establish regular and meaningful consultation and collaboration with Tribal officials in the development of federal policies. The Department of Defense (DOD) *American Indian/Alaska Native Policy: Alaska Implementation Guidance* requires DOD components to “consult on a Government-to-Government basis with Tribes concerning DOD activities which may have the potential to affect Tribal rights and resources, on or off Indian Land, and interests in Indian land.” According to DA PAM 200-4, “[t]he end goal of consultation is the resolution of issues in terms that are mutually acceptable to the U.S. Army and to the participating Native American, Alaska Native, and Native Hawaiian groups” (Appendix F).

In accordance with these executive orders and policies, USARAK held four government-to-government meetings with federally recognized Tribes in Alaska after the release of the Transformation of the USARAK Draft EIS (Chapter 7). Two were held in Fairbanks and two were held in Anchorage. The government-to-government coordination and consultations were held independent of the public coordination process.

Before the meetings, the USARAK Native Liaison contacted the Tribes via phone, fax, and U.S. mail to notify them of the availability of the Draft EIS and the meetings. Travel cost

reimbursement was provided for Tribal members attending the meetings¹. The Draft EIS packages were mailed to the Tribes from the Center for Environmental Management of Military Lands (CEMML) at Colorado State University.

The first set of meetings held were designed to inform Tribes of the Draft EIS and give the Tribes an opportunity to interact with staff involved in the project. The all day meetings were held on June 23, 2003 at the Chena River Convention Center in Fairbanks and on June 27, 2003 at the Sheraton Anchorage Hotel. Attendance is estimated at 28 tribal representatives in Fairbanks and 20 in Anchorage. USARAK Chief of Environmental Planning gave a presentation concerning USARAK transformation and the Draft EIS, followed by the Garrison Commander who spoke and took questions from attendees at both meetings. Time was also given for a general question and answer period. CEMML staff was also available to discuss technical aspects of the document.

The second set of meetings was designed for USARAK to collect Tribal comments on the Draft EIS. The meetings were held on July 21, 2003 at the Chena River Convention Center in Fairbanks and on July 23, 2003 at the Sheraton Anchorage Hotel. Attendance is estimated at 23 tribal representatives in Fairbanks and 6 in Anchorage. USARAK Chief of Environmental Planning gave a brief version of the earlier informational presentation. Tribes asked questions and interacted with staff involved in the project. Verbal comments were recorded by a court reporter. Tribes were encouraged to send in comments if they were not ready to give verbal or written comments at the meetings. They were informed that comments would be accepted through September 9, 2003.

After the meetings, the USARAK Native Liaison sent transcripts out to the Tribes. Comments gleaned from the second set of meeting transcripts can be found in Section 9.4.1.

9.4 COMMENTS ON THE DRAFT EIS AND ARMY RESPONSES

This section contains comments received during the Draft EIS comment period and the Army's responses to them. Publications cited in the responses can be found in Chapter 6, Bibliography. Responses were coded and presented in order of comment acquisition. Topics used in the comment/response process are listed in Table 9.1.a. This section is divided into three subsections: Government-to-Government Tribal Meetings, Comments and Army Responses (Section 9.4.1); Government, Agency, and Non-Governmental Organizations Comments and Army Responses (Section 9.4.2); and Public Meetings, Comments and Army Responses (Section 9.4.3).

¹ Some Tribal representatives did not turn in their paperwork early enough to receive invitational travel orders and travel cost reimbursement.

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9.4.1 Government-to-Government Tribal Meetings, Comments and Army Responses

Page 1

U.S. ARMY GARRISON
ALASKA/TRIBAL GOVERNMENT-TO-GOVERNMENT MEETING
TRANSFORMATION OF THE
U.S. ARMY ALASKA
Draft Environmental Impact Statement

COMMENT SESSION

Held on Monday, July 21, 2003
Time: 9:10 a.m. to 3:00 p.m.

Meeting Proceedings Held at

CHENA RIVER CONVENTION CENTER
109 Clay Street
Fairbanks, Alaska

Reported by: Carol A. McCue, RMR
Heartland Court Reporters
Fairbanks, Alaska

Page 2

1 P R O C E E D I N G S
2 (Meeting proceedings convened at 9:10 a.m.,
3 July 21, 2003.)

Page 5

7 MEMBER OF AUDIENCE: How many soldiers are
8 there in Alaska right now?

Page 7

1 MEMBER OF AUDIENCE: There's currently an EIS
2 out for another infrastructure development on Donnelly?
3 MR. KEVIN GARDNER: Oh, the range --

Purpose and Need/Proposed Action 01
Currently, 6,577 soldiers are stationed in Alaska. Please see Chapter 2, Table 2.2.a.

4 MEMBER OF AUDIENCE: Right, the range.
 5 MR. KEVIN GARDNER: The range environmental
 6 assessment.
 7 MEMBER OF AUDIENCE: Right.
 8 MR. KEVIN GARDNER: Yeah.
 9 MEMBER OF AUDIENCE: Now, where does the
 10 transformation on that tie in together or do they or?

Page 10

1 MEMBER OF AUDIENCE: I notice they are going
 2 to be doing this for, what, 10 years? Be training in
 3 these areas?

Page 12

6 MEMBER OF AUDIENCE: What I was asking the
 7 question was how much of an impact is that going to be
 8 in that certain area there for that long a -- that many
 9 years on -- with all that equipment running around out
 10 there tearing up the tundra?

Page 14

22 MEMBER OF AUDIENCE: Do they have a plan on,
 23 like I say, if you're not using an area, are they going
 24 to replant trees and for environmental?

Page 19

12 MEMBER OF AUDIENCE: Are you guys trying to
 13 grow moss and stuff, filling it back up? I'm just
 14 curious because, you know, it's one thing to plant
 15 trees, but tundra is kind of -- it would be pretty hard
 16 to repair.

Page 24

20 MEMBER OF AUDIENCE: Yeah, well, Colonel
 21 Lehman brought that up, though, and there was also
 22 implications, you know, of road damage and other

Donnelly Range EA 01

The Battle Area Complex (BAX) has been identified as a requirement for training the Current Force. A separate NEPA document is being prepared to evaluate this project.

Purpose and Need/Proposed Action 02

SBCT is expected to train in the manner described in the EIS for approximately 30 years; Army training on the Alaska training areas is expected to continue indefinitely.

Maneuver Impacts 01

For predicted impacts to these resources, please see Section 4.4, Soil Resources; Section 4.7, Wetlands; and Section 4.8, Vegetation.

Maneuver Impacts 02

USARAK has a Land Rehabilitation and Maintenance program and this would continue under the proposed action. Please see Appendix H for a description of this program.

Maneuver Impacts 03

USARAK has a Land Rehabilitation and Maintenance program and this would continue under the proposed action. Please see Appendix H for a description of this program.

Human Health and Safety 01

Equivalent Axle Loads (EALs) have been computed for the Strykers. These would add

23 side-effect costs of those things.

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7 MEMBER OF AUDIENCE: When are you going to
8 start this training?

Page 28

12 MR. KEVIN GARDNER: That doesn't mean they
13 have everything they need or all the -- all the
14 Strykers, there will be more coming in and the
15 different variations of the vehicle will still be
16 arriving after that date.
17 But that May of 2005 date is the date where
18 they could be, if needed, deployed. They will have
19 enough equipment, enough training at the right level
20 where the Army's confident to send them into the hot
21 zone.

22 MEMBER OF AUDIENCE: Can these things be
23 lifted by helicopter?

Page 29

19 MEMBER OF AUDIENCE: Coming in from Minto,
20 Fairbanks, I got into this real world frame of mind as
21 to how the Stryker Brigade combat team could really
22 affect Minto.

23 And some of the people who had heard about the
24 Stryker Brigade are wondering are we going to see
25 Strykers zipping all over the place here in the winter

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1 up the ice roads and here and there.

2 And because as I drove in, I thought it's a
3 recon surveillance unit, basically, right? It's a --

7 MEMBER OF AUDIENCE: And the only way I could
8 see, okay, we've got cold weather training is very
9 important. You've got a good trail up to Livengood,
10 pavement, good, fast run; you've got terrible gravel

approximately 300-350 EALs per year to the Alaska highway system. This represents a fraction of a percent of current annual EALs.

Purpose and Need/Proposed Action 03

Under the proposed action, SBCT training would commence in Spring '04.

Purpose and Need/Proposed Action 04

No, the Stryker vehicles are designed to be lifted by large transport planes.

Purpose and Need/Proposed Action 05

Strykers use would be limited to maneuver training on military lands and would use highways to convoy to and from military lands.

11 from Livengood on into past where the pipeline was
 12 breached, and on into Minto, Manley. And an ice road
 13 or a winter trail that would go into Rampart, and
 14 myriad cat trails that miners have used.

15 And when we talked about ruts in the tundra, I
 16 thought, boy, an aerial photo of our area out there
 17 is -- you can just see where the trails are.

18 MR. KEVIN GARDNER: Yeah.

19 MEMBER OF AUDIENCE: And I just wondered,
 20 would we ever, do you think, be in a situation where we
 21 would see a Stryker battalion zooming up the Elliott,
 22 up over the gravel, up over the winter roads, Rampart,
 23 wherever?

24 It would seem to be a useful bit of training
 25 if you're trying to get troops someplace fast, like

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1 that oil spill, where the pipeline was breached with a
 2 rifle bullet, it's so vulnerable, I'm just wondering is
 3 that part of what Stryker would do to move troops into
 4 an area like that or is it good for training or am I
 5 not in the real world at all?

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6 MEMBER OF AUDIENCE: And then you have a ratio
 7 of for every soldier, what it -- you know, from the
 8 civilian aspect, how many people it takes to support
 9 that soldier. Do you have a ratio like that?

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1 MEMBER OF AUDIENCE: And then from that
 2 socioeconomic impacts, is there a breakdown like on the
 3 recreational impacts and also the hunting and fishing
 4 aspects, too?
 5

Socioeconomics 01

At Fort Wainwright, the average ratio of non-uniformed personnel per uniformed personnel is 0.42. At Fort Richardson, it is 0.62 (Appendix F). This includes support personnel who may be employed from the local economy or brought in by the Army from other locations, depending on the skills needed. Please see Sections 4.13.4.2 and 4.13.4.4, Socioeconomics, for projected personnel increases.

Socioeconomics 02

Socioeconomic impacts to hunting and fishing are considered from the perspective of decreased success rates resulting from increased numbers of hunters and anglers and decreased access to USARAK lands for recreational activities. Please see Sections 3.13.6 and 4.13.4, Socioeconomics, for this analysis. Further discussion can also be found in Sections 3.14 and 4.14, Public Access and Recreation.

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1

20 MEMBER OF AUDIENCE: I would like to make a
21 comment on we're probably going to have a problem with
22 all of our migratory birds and all of the fish in the
23 rivers from this Stryker Brigade upriver from us.
24 I'm from Manley Hot Springs. And I kind of
25 think that all the impact from all this fumes from the

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1 vehicles and all the ammunition that's going to be
2 fired out in the flats up there or have been fired up
3 in the flats, all our game is going to be contaminated,
4 I think. Especially our fish. They go upriver to
5 spawn and hatch the little ones.
6 And our migratory birds fly through there and
7 land in the lakes and eat all this vegetation that's in
8 the lakes and on the land. And our moose and the bears
9 that's walking through eating that contaminated soil
10 and stuff like that, and then the -- when the moose
11 die, you have a lot of birds that come in and live off
12 of those animals. And they will fly off to another
13 area upriver, wherever it's at, down river.
14 And I think we're going to have a little
15 problem with that in later years. But there's nothing
16 we can do about it. Just one of the things that's --
17 goes on, I guess.

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16 MEMBER OF AUDIENCE: Okay. I have a comment,
17 Barry Westfall, native village of Eagle.
18 Pretty much up there on the Yukon River,
19 however, I see a very possible impacts upon our
20 wildlife, both the caribou herds and also the migratory
21 birds and wildlife there, not only from the impact of
22 the activities on the lands, but also the off-duty
23 activities of the personnel.
24 We do have a road system up. We have very
25 heavy impact from outside people during our caribou and

Wildlife and Fisheries 01

Uptake of contaminants through browse was found to be negligible (Palazzo et al. 2002). Additional soil and water monitoring is planned as mitigation. Please see Appendix H for a description.

Environmental Awareness 01

Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2, Subsistence. USARAK's Native Liaison will continue to work with Tribes to address this concern.

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1 moose hunting seasons. And with the increase of the
2 military personnel, I think that that activity will
3 also increase, too.

4 So as our -- our comment is that that is our
5 concern. And you know, I've heard a lot of -- we
6 talked about it in the last meeting some, but in this
7 meeting and most of the talk about impacts on the lands
8 has been on the land, and actually, you know, the
9 appearance of the, you know, the ruts in the ground and
10 so forth. But I would like to get some reassurance,
11 you know, from the military as to the preservation of
12 our wildlife.

13 We still have a lot of people that depend upon
14 that subsistence, fish in our rivers, which as this
15 gentleman talked about, you know, the spawning, you
16 know, in the streams, to our caribou herds and the
17 increased pressure upon those herds and upon the moose
18 population in our area.

19 And that's -- that's what we're looking at.

20 And that's our main concern about the added personnel
21 and the activity in the area. Thank you.

22 MR. KEVIN GARDNER: Thank you.

23 MEMBER OF AUDIENCE: One question I have is in
24 regards to the transporting of, you know, the
25 equipments between Ft. Wainwright and Donnelly and

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1 Gerstle is has there been any formal arrangement made
2 with the State of Alaska or the Federal Highway
3 Administration regarding increased, you know,
4 degradation of the, you know, Richardson, Alaska
5 highways?

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5 MEMBER OF AUDIENCE: This is basically a
6 comment that I think fits what our people in Minto feel
7 and think about our military and also what some

Human Health and Safety 02

Equivalent Axle Loads (EALs) have been computed for the Strykers. These would add approximately 300-350 EALs per year to the Alaska highway system. This represents a fraction of a percent of current annual EALs. Additional roadway impacts from the SBCT are expected to be negligible. Please see Section 4.17, Human Health and Safety, for information on convoys and traffic.

8 conversations during the break led me to know is true.
 9 We expect our troops to protect us and our
 10 nation. That's a given. Troops cannot do this without
 11 training. And I think the people sitting around here
 12 and in our villages are willing to allow this training
 13 to happen, but as was brought out in the earlier days,
 14 the military kind of ran roughshod over the country,
 15 and I think that was something you admitted to earlier.
 16 This has changed. We have a voice now. We
 17 have some leverage to bring change into misuse. And
 18 also to bring back, as you said, to -- we can never
 19 bring back the tundra to its pristine nature, but we
 20 can bring it back as close as possible, humanly
 21 possible.
 22 So what I'm saying is we have the leverage
 23 now, but we need to continue to watch what's going on.
 24 As Mr. Gurtler says, there's impact even though we're
 25 way down past all of these areas. The fish don't see

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1 the sign saying this is military property, stay off.
 2 The moose wander through, the bears wander through, the
 3 ducks and geese land.
 4 We have to use steel shot to shoot ducks and
 5 geese. I don't know what they are eating out there in
 6 the areas you're training on.
 7 But the point is I believe our people are
 8 willing to go halfway with this, but we expect fully,
 9 as you say, protection for the caribou herds on the --
 10 toward Eagle. There's always been inroads on the
 11 caribou herds even in the early days, like hunters, but
 12 now with more and more hunters coming in, greater
 13 tragedy to the game.
 14 Our fishing on the flats out of Minto, we're
 15 connected by road and so we do see a lot of military
 16 now, and there has been inroads, but we are educating
 17 in the village as we come, don't leave your fish guts
 18 out here on the bank, our kids swim down here, here's
 19 trash barrels. If you're not going to use the game,
 20 give it to the people here in the village to utilize,

Wildlife and Fisheries 02

Uptake of contaminants through browse was found to be negligible (Palazzo et al. 2002). Additional soil and water monitoring is planned as mitigation and is discussed in Appendix H.

21 but respect the land. This is a God-given blessing
 22 that we are stewards of, and you are, too. And please
 23 protect that obvious gift we have.

24 So what I'm saying is we'll, I believe, go
 25 halfway, but don't expect us to turn everything over

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1 without you coming back and keeping this land like it's
 2 supposed to be kept. We don't want to lose it. The
 3 ducks.

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24 MEMBER OF AUDIENCE: Is there a review system
 25 set up for when you're into this training for two

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1 years, where this group of people meets and reviews
 2 what you've done to date? Is there anything cranked
 3 into this whole effort?

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8 MEMBER OF AUDIENCE: Yes. This is Bear
 9 Ketzler from the Nenana Native Council. Being one of
 10 the communities that are really closely the proximity
 11 of the Stryker Brigade, of course, you know, we also
 12 share the environmental aspects.

13 But one of the things that because we're so
 14 close that the human impact and the accessibility that
 15 since we're right next door, and we do have problems
 16 right now with trespass on our native lands, as well as
 17 Doyon has landholdings in the just general proximity.

18 But as a recreational aspect of because we do
 19 see a lot of people that come to Nenana and put their
 20 boats in and run up the Wood River area here, which
 21 is -- follows the -- your Tanana training, Tanana Flats
 22 training area.

23 But you know, as this moves forward, we would

Purpose and Need/Proposed Action 06

USARAK's Native Liaison will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like transformation. We always encourage dialogue on how USARAK can work more closely with Tribes. In addition, USARAK provides opportunities for the public to comment on Integrated Natural Resources Management Plans (INRMPs). Please see Section 2.2.3.7, Description of Proposed Action and Alternatives, for existing and proposed mitigation, including monitoring programs.

Environmental Awareness 02

From comments gathered during Tribal consultation, the planned approach includes requesting land use policies and procedures from Doyon, Ltd. and Cook Inlet Region, Inc., and the village corporations within these regions. This information will then be communicated down the chain of command from the Commander to Soldiers.

24 like to see some relationships developed with the
25 military on kind of quasi-control recreational.

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1 And that could be meaning something simple as
2 just notifying us that the recreational department, I
3 don't know what they call them in the military or in
4 the Army, but when I was in the Marines, they called it
5 special services.

6 And when we went in certain areas when we were
7 in Hawaii, we had to have permission from the Hawaiian
8 tribal councils there to access some of their smaller
9 islands. And in fact, they even assigned guides to us
10 when we went over to those little islands.

11 But, you know, some of the aspects like that
12 that we'd be interested in sitting down and talking and
13 working out some sort of relationship of how we can
14 make sure that -- that when they are in the area, if
15 they are hunting, they are fishing, that there's no
16 waste. As well as the trash cleanup.

17 As well as just not bothering the waterfowl
18 that's there, especially during the early spring when
19 they are laying their eggs, to spawning, fish spawning,
20 and also around the middle of May when the fish start
21 to lay their eggs.

22 And so anyway, those kind of things I would
23 like to see a little more -- just some follow-up on how
24 we can work together being that we're so close next
25 door in Nenana.

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2 MEMBER OF AUDIENCE: This training you're
3 staying in certain areas that they designated impact
4 areas for like fire zone and shooting all over the
5 country, certain spots where they have their artillery
6 tanks?

22 MEMBER OF AUDIENCE: Okay. Because it seems
23 like, you know, you can't help but tear the land up,
24 you know, for training the troops. These guys are

Wildlife and Fisheries 03

Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2, Subsistence. USARAK's Native Liaison will continue to work with Tribes to address this concern. Please refer to Sections 3.9 and 4.9, Wildlife and Fisheries, and Section 2.2.3.7 for specific mitigation measures. In addition, please see INRMPS for ongoing Army procedures to protect and preserve natural resources.

Purpose and Need/Proposed Action 07

Under the proposed action, SBCT would train on training areas. No new impact areas would be created.

Maneuver Impacts 04

USARAK has a Land Rehabilitation and Maintenance program and this would continue

25 going to harm's way, they have got to be trained

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1 properly and just there's no way around it. It seems
2 like to keep the damage to a minimum.
3 You know, I've been in the military for a
4 couple of years myself, and I was in Germany on a
5 self-propelled unit, there at Grafenwoehr, and the area
6 around Germany is pretty much the same area that is
7 around here, you know. Swampier.

9 MEMBER OF AUDIENCE: One of the things I think
10 I would like to see is probably military police
11 patrolling the fish and wildlife out of the area
12 because I don't know how many people are going to be
13 coming up here in the military, whether it's the Air
14 Force, Coast Guard, and all the other agencies.
15 I remember in the early days they had military
16 police just walking around because if there was a big
17 impact, influx of people, the state police and the --
18 there's not very many of them around. And it's a big
19 draw on the state.

20 But with the military police, they could be
21 patrolling the military. Even out on the roads, out in
22 the hunting areas, Fish and Game. And just have their
23 presence there because there's going to be a lot of
24 wanton waste. I've seen it happen before a lot of
25 times, but they just didn't have enough.

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22 MEMBER OF AUDIENCE: It seems like most our
23 big concerns are especially about our fisheries, and
24 since this is going to be a government-to-government
25 kind of work, government-to-government, you know, I was

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1 wondering if we could utilize traditional knowledge in
2 some of the tributaries, the spawning -- spawning

under the proposed action. Please see Appendix H for a description of this program.

Environmental Awareness 03

USARAK has no authority to patrol off Army posts and lands, either with Military Police or conservation officers.

Subsistence 01

USARAK's Native Liaison will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like transformation. We always encourage dialogue on

how USARAK can work more closely with Tribes.

3 creeks for -- for the purpose of trying to prevent, see
4 what kind of damage, and use traditional knowledge to
5 look way back, way back before the military got there
6 and then see how it was then and see how it is today.
7 And if we could get some kind of information
8 on that and then, you know, use that to prevent further
9 damage and to keep that -- keep that document and to
10 keep that for everybody to see. I think that would be
11 really helpful.
12 And traditional knowledge, I would like to see
13 that practiced a lot -- a lot more.

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11 MEMBER OF AUDIENCE: The comment here, he's
12 talking about using the traditional knowledge, which I
13 think is something that we have to address because one
14 problem that we're having up in Eagle, we have -- we
15 have this huge tour boat that goes between Dawson and
16 Eagle. It comes down from Dawson every day and returns
17 every day. So it makes -- makes that trip twice.
18 The problems that we're having with them is we
19 know that that boat is killing a lot of the salmon fry
20 up and down the river. Just because of the weight that
21 it puts out and what it's doing to the river banks and
22 everything else.
23 But when you talk to them about this, they
24 say, well, we have no proof that this is -- that, you
25 know, we're doing anything. You know, to the salmon

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1 fry.
2 So they give us things like oh, when you see
3 that happening, take that sample of that dead fry and
4 within, I think it's an 8-hour time span, we have to
5 get it to our lab to analyze, which is absolutely
6 impossible, you know, to do. And because of the remote
7 locations. But see, what they are basing theirs on is
8 saying, hey, we need hard, scientific, documented
9 evidence.

10 What he's saying is traditional knowledge
 11 needs to play a part so that we don't have to wait
 12 until there's damage done and then start with a
 13 baseline assessment and then go from there, you know,
 14 after the fact. We need to be able to use the
 15 traditional knowledge as the baseline.
 16 And it's probably in most cases not written
 17 down, you know, even at this point. So that -- that is
 18 a big concern.

19 And I think it's something that needs to be
 20 addressed in some manner, you know, so that we don't
 21 have to start from, you know, step one after, you know,
 22 the -- when they notice that, okay, these impacts,
 23 things have been damaged, now where do we go and we
 24 start getting the line of, well, we'll have to, you
 25 know, do some baseline assessments and watch it for the

Page 60

1 next few years and then, you know, go from there. We
 2 need -- we need to be able to go from point zero, you
 3 know, on the time scale.

Page 61

20 MEMBER OF AUDIENCE: I have a concern about
 21 the military moving into Alaska again. And this is
 22 more with the Upper Tanana area. I've seen it before
 23 that the military activities happening up in the Upper
 24 Tanana with our fish and wildlife. And big game
 25 hunting. We have a problem up there with military

Page 62

1 coming to the Upper Tanana target practicing our big
 2 game.

Page 64

17 MEMBER OF AUDIENCE: I think that, you know,
 18 they should be educated now.

Subsistence 02

USARAK's Native Liaison will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like transformation. We always encourage dialogue on how USARAK can work more closely with Tribes.

Environmental Awareness 04

Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2, Subsistence. USARAK's Native Liaison will continue to work with Tribes to address this concern. Please refer to Sections 3.9 and 4.9, Wildlife and Fisheries, and Section 2.2.3.7 for specific mitigation measures. In addition, please see INRMPs for ongoing Army procedures to protect and preserve natural resources.

2 MEMBER OF AUDIENCE: I think when we met a
3 couple weeks ago, I think Mr. Ketzler over there had a
4 good idea, and that if the -- if the soldiers were
5 going into the field and hunting and stuff that they --
6 that they be shown a video or something like that, that
7 would show the cultural practices of the people who are
8 living in that area, be it Upper Tanana or the Koyukuk.
9 We're kind of protected down there for -- not
10 really protected, we're not right in the way of the
11 Stryker force it and its activities and stuff, but
12 still we have concerns with people coming in on the
13 Koyukuk River and environmental concerns.

14 And I thought it was a -- I thought his idea
15 of something, I don't know -- I don't know what you
16 guys have right now in the way of training these people
17 as to activities of the -- as people that live in that
18 particular area. And I think -- I think that would
19 kind of be -- be in line with any hunting practices or
20 video that -- that they should be -- have a kind of a
21 mandate to show that to them for just as he said, for
22 respect of a person's native land.

7 MEMBER OF AUDIENCE: Well, I would like to see
8 it mandatory punishment for these types of things,
9 because we look at people that are up here for two,
10 three years, you know, and these guys are wanting to go
11 back home after their tour of duty --

5 MEMBER OF AUDIENCE: Well, indeed, from my
6 perspective, I'm sure from many others here, you know,
7 the effect on that wildlife and the decline and the
8 disruption of natural wildlife migrations and their
9 populations concerns me much more than a rut, you know,
10 in the ground.

Environmental Awareness 05

USARAK has no authority to patrol off Army posts and lands, either with Military Police or conservation officers. Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2, Subsistence. USARAK's Native Liaison will continue to work with Tribes to address this concern. Please refer to Sections 3.9 and 4.9, Wildlife and Fisheries, and Section 2.2.3.7 for specific mitigation measures. In addition, please see INRMPs for ongoing Army procedures to protect and preserve natural resources.

Environmental Awareness 05, continued.

See above response.

Wildlife and Fisheries 04

For predicted impacts to these resources, please see Section 4.9, Wildlife and Fisheries, and Section 4.15, Subsistence.

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16 MEMBER OF AUDIENCE: I'm Theresa Clark,
17 representing the tribal council, and my concerns are
18 exactly what you're talking about. But another one
19 that I -- you know, that another impact that I didn't
20 really see covered was that the impact of the number of
21 persons that the Army is going to bring in to support
22 the Brigade force.

23 You know, for last year we had this meeting,
24 then we had this other meeting, and within that time
25 frame, the Army was not able to come up with an

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1 estimate of number of people that are -- that the total
2 Stryker Brigade is going to, you know, encompass. And
3 that there will be some impacts because of the influx
4 of people, you know. You never did say how many
5 people. And so that was one impacts that you didn't
6 really put into this EIS.

7 And I would also like to state that you did a
8 really good job on doing the EIS and how you're going
9 to mitigate all of the actions for each of the
10 environmental impact that you put in. But what I would
11 like to see is that sometimes when environmental impact
12 statements are done, they are just thrown up on a --
13 into a storage and, you know, collect dust and are
14 never -- never enforced.

15 And you know, I just want to make sure that,
16 you know, that the Army continues to enforce this for
17 the whole time that the Stryker Brigade force is going
18 to be there.

Page 78

15 MEMBER OF AUDIENCE: Because that's something
16 that, you know, the cultural aspect, as well as the
17 environmental aspect, you know, to get some sort of
18 training like this, I know that -- I forgot what it
19 was, maybe four hours of training when we went to

Socioeconomics 03

At Fort Wainwright, the average ratio of non-uniformed personnel per uniformed personnel is 0.42. At Fort Richardson, it is 0.62 (Appendix F). This includes support personnel that may be employed from the local economy or brought in by the Army from other locations, depending on the skills needed. Please see Sections 4.13.4.2 and 4.13.4.4, Socioeconomics, for projected personnel increases.

20 Hawaii on how to mainly it was kind of a training that
21 was scare tactic to keep us soldiers on base and not
22 get scalped by a Hawaiian or something.
23 As well as in Okinawa, Japan, when we were
24 there, we had training because there was a lot of
25 anti-American attitudes there in Japan towards the base

Page 79

1 there.
2 But you know, just to turn them, you know, not
3 to develop education systems around those kind of
4 aspects but develop something about the Alaska native
5 culture.
6 I know a lot of things, too, that moved over
7 to Hawaii, they had actually had a session where, you
8 know, for access of housing and transportation and
9 things like that, but this is -- I don't know if they
10 do that for this military bases here, but that would be
11 a perfect place to have the family and the soldier
12 involved.
13 And then introduce a cultural, by having
14 somebody from Tanana Chiefs or somebody from the
15 community of Fairbanks once a week or something like
16 that whenever the soldiers come in, you know, to go to
17 some -- to sensitivity aspects of where they are living
18 and this is what's expected of them, things like this.
19 Because I've seen some of the training videos
20 that were produced in the early '40s around Alaska, and
21 in fact, I should have brought a copy because their
22 view on the world back then and what today is, you
23 know, really different.

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16 MEMBER OF AUDIENCE: Yes. I would like to
17 make the comment that humans aren't the only people
18 competing for all our game. We have the wolves, we
19 have black bears. Grizzly bears. Just about
20 everything.
21 And when we talk about just the humans, that's

Environmental Awareness 06

Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2, Subsistence. USARAK's Native Liaison will continue to work with Tribes to address this concern. Please refer to Sections 3.9 and 4.9, Wildlife and Fisheries, and Section 2.2.3.7 for specific mitigation measures. In addition, please see INRMPPs for ongoing Army procedures to protect and preserve natural resources.

Wildlife and Fisheries 05

Thank you for your comment. For predicted impacts to these resources, please see Sections 3.9 and 4.9, Wildlife and Fisheries.

22 just a small part of what's been taken out there. The
 23 other game have been taking moose, more so than the
 24 human beings.

25 But that's why we're being careful on how we

Page 82

1 would like to see the Fish and Game handle this
 2 situation. They are giving out too many permits to
 3 hunt. And I would like to see them stop and consider
 4 because the moose population is going down in all
 5 areas.

6 And where I'm from, there's a boat on every
 7 corner in the falltime hunting. And they just walk
 8 right through your camp to get back to the lake there
 9 that you camped at. But it's just one of the things
 10 that I would like to mention that we're not -- humans
 11 aren't the only ones that's competing for this game.

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5 MEMBER OF AUDIENCE: Yeah, Kevin, I think
 6 probably it would be in everyone's interest if the
 7 military would be able to put together some type of
 8 idea about the total amount of people that would be
 9 affiliated. Talking about the 3800 actual Brigade
 10 members, but the support and the dependents, and then
 11 the way the Brigade works, in other words, with
 12 conjunction with its airborne element for assault, and
 13 its transport element with the Air Force. The Brigade
 14 is basically worthless without that transport element
 15 and without that assault element.

16 And the idea, then, that this is the actual
 17 amount of people that would be in Alaska. Not just the
 18 3800 -

Page 88

7 MEMBER OF AUDIENCE: Like support staff and
 8 dependents, have you guys looked at how this will
 9 affect the local job market?

Socioeconomics 04

Total projected population increases under each alternative (including non-uniformed personnel and dependents of uniformed personnel) have been added to the analysis. Please see Section 4.13.4, Socioeconomics, for specific numbers.

Socioeconomics 05

Transformation is expected to result in increased employment opportunities in Fairbanks and Anchorage. Please see Section 4.13, Socioeconomics.

1 REPORTER'S CERTIFICATE

2 I, CAROL A. McCUE, RMR, hereby certify:

3 That I am a Registered Merit Reporter for
4 Heartland Court Reporters and Notary Public for the
5 State of Alaska; that the foregoing proceedings, the
6 Government-to-Government meeting regarding US Army
7 Alaska Transformation, held July 21, 2003, were written
8 by me in computerized machine shorthand and thereafter
9 transcribed under my direction; that the transcript
10 constitutes a full, true and correct record of said
11 proceedings taken on the date and time indicated
12 therein;

13 Further, that I am a disinterested person to
14 said action.

15 IN WITNESS WHEREOF, I have hereunto subscribed
16 my hand and affixed my official seal this ____ day of
17 _____, 2003.

18
19
20
21
22 CAROL A. McCUE, RMR
Registered Merit Reporter
Heartland Court Reporters

23
24 My Commission Expires: February 15, 2006

25

Page 1

U.S. ARMY GARRISON
ALASKA/TRIBAL GOVERNMENT-TO-GOVERNMENT MEETINGS
TRANSFORMATION OF THE
U.S. ARMY ALASKA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Held on Wednesday, July 23, 2003
9:00 a.m. to 11:50 a.m.

Meeting Proceedings Held at

SHERATON ANCHORAGE HOTEL
Yukon Room
401 East 6th Avenue
Anchorage, Alaska

Reported by: Gail Ruth Peckham, RPR
Pacific Rim Reporting
Anchorage, Alaska

Page 2

1 P-R-O-C-E-E-D-I-N-G-S
2 (Meeting proceedings convened at 9:00 a.m.,
3 July 23, 2003, Anchorage, Alaska)
24 SPEAKER FROM AUDIENCE: Yeah. I wanted to
25 know if they -- when they're going through streams with

Page 7

1 the vehicles and stuff, if they know the time -- you
2 know, what time of year, when they're spawning, maybe
3 when they're still going through the streams, and
4 interrupting the gravel. Because when the eggs are
5 spawned, you know, they have to be down in the gravel
6 to stay, or something like that.
9 Because, I know, I worked for Alyeska, and
10 there are certain times of year we can't drive through

Wildlife and Fisheries 06

Maneuvers over streams would not occur during spawning and incubation. The Army uses designated fording sites. Please refer to Section 4.9, Wildlife and Fisheries, for specific mitigation measures. See Appendix H for ongoing Army procedures to protect and preserve natural resources.

11 streams, or we have to drive a certain speed, because
12 of the spawning. And then some of the fish are so big,
13 they can't get through anywhere.
14 So, do they have anything like that in there?

Page 9

19 SPEAKER FROM AUDIENCE: Yeah. Because, even,
20 you know, in damaging the brush, the grass and
21 everything, in there, it's a big impact.

Page 14

3 SPEAKER FROM AUDIENCE: And the EIS says
4 there's no -- there's going to be no impact on the
5 geology.
6 Now, I'm not a scientist, but I remember -- I
7 mean, there's going to be three times the munitions, or
8 so forth. And I know that in Fort Wainwright, when
9 they blew up a couple of hills, I'm pretty sure there
10 were rocks in the hills.
11 So I don't understand why it says there's no
12 geological impact.

Page 18

8 SPEAKER FROM AUDIENCE: Well, I've -- you
9 know, I've already mentioned that we don't see the
10 wildlife distribution maps in this document, for Fort
11 Richardson, like we did for the other bases. So now
12 I'm wondering what the condition of the research on
13 those things is. So I'm just flipping through here, I
14 don't see references to many specific studies of those
15 having been done.

Page 19

6 SPEAKER FROM AUDIENCE: And what of fish?
7 MR. ROGER SAYRE: Fish, for distribution
8 maps?
9 SPEAKER FROM AUDIENCE: Uh-huh.

Maneuver Impacts 05

For predicted impacts to these resources, please see Sections 4.4, Soil Resources; 4.7, Wetlands; and 4.8, Vegetation. See Appendix H for current mitigation of maneuver impacts.

Geology and Soils 01

Impacts to soils are expected under the proposed action; however, no impacts are expected to underlying bedrock. Please see Sections 4.3 and 4.4, Soil Resources, for a description of these impacts.

Wildlife and Fisheries 07

Wildlife and fisheries maps for Fort Richardson have been added. Please see Section 3.9, Wildlife and Fisheries, and Figures 3.3.a, b, and c in Appendix A.

10 SPEAKER FROM AUDIENCE: And I know we haven't
 14 really mentioned this. But we know that the surveys of
 15 cultural sites or resources, or whatever, is woefully
 16 inadequate. I didn't see any good maps on that,
 17 either, so...

18 MR. KEVIN GARDNER: Those are the kinds of
 19 things, when you're ready for your formal response,
 20 make sure you tell us.

21 SPEAKER FROM AUDIENCE: Yeah.

22 You know, all those things are, I think, ripe
 23 for mitigation. So I think that maybe through this
 24 process we can suggest implementation and funding of
 25

Page 20

1 this cooperative agreement. This cooperative agreement
 2 has been tied up for how long now? Three months.

3 SPEAKER FROM AUDIENCE: Well, maybe. But it

17 just seems like -- I don't know if your process here,
 18 but, under the mitigation, can facilitate funding, to
 19 go to activities in that agreement. It seems like it
 20 has a potential direct conflict to facilitate that.
 21
 22

Page 22

3 SPEAKER FROM AUDIENCE: And the other
 4 mitigation that I'd like to see is improved hunting and
 5 fishing opportunities for the Eklutna people.

6 And just for your information, I did find two
 7 cooperative agreements for management of fish and
 8 wildlife resources on Army lands. They're under U.S.
 9 Army Alaska, Page 6.2.3, at the top.

Page 23

10 SPEAKER FROM AUDIENCE: And also, about
 11 the -- this information that goes into these rating
 12 systems, of moderate to severe impacts, I'm just sort

Cultural Resources 01

Maps showing areas surveyed for cultural resources have been included. Please see Figures 3.12.a, b, c, and d in Appendix A, and Sections 3.12 and 4.12, Cultural Resources.

Other 01

There is currently a draft cooperative agreement between USARAK and the Native Village of Eklutna that is under review.

Wildlife and Fisheries 08

The Army can control access to Army land. Fish and wildlife management on Army land is controlled by the federal and state wildlife agencies.

Wildlife and Fisheries 08, continued.

Please see above response.

13 of not clear about how those -- still not clear how
14 those are derived, from what type of research.

19 SPEAKER FROM AUDIENCE: No, not the criteria,
20 but rather, the research that goes into making those
21 assessments.

Page 25

7 SPEAKER FROM AUDIENCE: Yeah. Because I'm
8 still looking at, you know, scientific research papers
9 on that, that don't say anything like this.

Page 30

18 SPEAKER FROM AUDIENCE: Could I just make a
19 note, that the definition of "subsistence," there's one
20 for regulations, and then, there's one that Native
21 people understand, which is much broader than the
22 Federal definition.

23 So a lot of times, when we're talking about
24 subsistence, we're not talking about that definition
25 for hunting and fishing. And there's also, like berry

Page 31

1 picking, and those kinds of things.

2 And regardless of whether it's rural area or
3 not, our tribal members traverse all over the state to
4 collect things: Down to Seward and everywhere.

5 And we have our local fishing net, and so
6 forth, with the special permit. Now, we don't pay for
7 that special permit; we have that.

8 So I think there's more to it than just
9 saying, "Oh, the public can come, if you know somebody
10 and you got five bucks."

Page 33

4 SPEAKER FROM AUDIENCE: So, which makes it
5 very hard to know how to address it, since you say,

Other 02

For a description of wildlife impact analysis methodology, please see Section 4.9.4.1.1, Wildlife and Fisheries. Please see Chapter 5, List of Preparers and Contributors, for breadth of consultation and professional experience involved in impact assessment, and Chapter 6, Bibliography, for a list of scientific publications and documents cited throughout the EIS.

Subsistence 03

Varying meanings of "subsistence" are acknowledged. See Section 4.15.4.4, Subsistence. Impacts have been revised since the Draft EIS.

6 "There's no impact on subsistence," in the report.

14 SPEAKER FROM AUDIENCE: Are you also
15 counting, like gathering berries, plant gathering, egg
16 gathering?

Page 34

22 SPEAKER FROM AUDIENCE: Yeah. Well,
23 that's -- I'm looking for -- I think the best example,
24 for a potential mitigation scenario, is: Fish and Game
25 has this community fishing net, for the Eklutna people;

Page 35

1 The Eklutna people can take 1,000 fish out of the
2 Inlet. They check out -- from the tribe, they check
3 out the permit, to use the net. And something like
4 that could be developed on Fort Rich, or extended to
5 Fort Rich.

Page 36

19 SPEAKER FROM AUDIENCE: If there's
20 blueberries out there, and it's open to the public, and
21 it's during training when the blueberries are ripe,
22 that's not benefiting anyone that wants to go pick the
23 berries, also.

Page 44

11 SPEAKER FROM AUDIENCE: I'm curious to know
12 why it says that there was no ANCSA corporation in this
13 area.

16 SPEAKER FROM AUDIENCE: I would like the
17 numbers to be restated on the population impact,
18 because I've heard different numbers from the
19 presentation than what show up in the book.

Subsistence 03, continued.
Please see above response.

Wildlife and Fisheries 09

The Army controls access to Army land. Fish and wildlife management on Army land is controlled by the federal and state wildlife agencies.

Socioeconomics 06

Text has been modified to address this comment. Please see Section 3.13.4, Socioeconomics.

Socioeconomics 07

Total projected population increases under each alternative (including non-uniformed personnel and dependents of uniformed personnel) have been added to the analysis. Please see Section 4.13.4, Socioeconomics, for specific numbers.

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20 SPEAKER FROM AUDIENCE: This might be kind of
21 picky. But it says there's no harbor seals found on
22 USARAK lands. And we get them probably up to the Knik
23 River, past Eklutna. So I know they're even up past
24 there, past Fort Rich, harbor seals, for what that's
25 worth.

Wildlife and Fisheries 10

Text has been modified to address this comment. Please see Section 3.9, Wildlife and Fisheries.

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1 REPORTER'S CERTIFICATE
2 I, GAIL RUTH PECKHAM, RMR, Registered
3 Professional Reporter, hereby certify:
4 That I am a Court Reporter for Pacific Rim
5 Reporting and Notary Public for the State of Alaska;
6 that the foregoing proceedings were taken by me in
7 Stenotype Shorthand and thereafter transcribed by me;
8 that the transcript constitutes a full, true and
9 correct record of said proceedings taken on the date
10 and time indicated therein.
11 Further, that I am a disinterested person to
12 said action.
13 IN WITNESS WHEREOF, I have hereunto
14 subscribed my hand and affixed my official seal this
15 day of _____, 2003.
16
17
18
19
20

Gail Ruth Peckham, RPR
and Notary Public for the
State of Alaska.

My Commission Expires 3-16-06

We agree with the EIS where it concludes that impacts due to Army activities may negatively affect cultural resources, tribes, subsistence, wildlife populations, etc. and that minority and low-income populations may experience somewhat greater negative impacts than other populations. See page 4-242. That is the right conclusion in spite of some missing and inaccurate study data. There are also other negative impacts that seemed to have been overlooked, which we are open to discuss. We are also very pleased that the Army is willing to mitigate to help minimize any disproportionate effects of transformation. Although existing efforts are underway and the Army proposes other efforts, evidently dependant upon financing, we have a number of suggestions for mitigating the negative impacts on our particular population and tribe.

Environmental Justice 01
Text has been modified to address this comment. Please see Section 3.18,
Environmental Justice.

Research indicates that there is no impact from intense sound vibration on the viability of bird eggs (Larkin 1996).

Maneuvers over streams would not occur during spawning and incubation. The Army uses designated fording sites. Please refer to Section 4.9, Wildlife and Fisheries, for specific mitigation measures. Please see Appendix H for ongoing Army procedures to protect and preserve natural resources.

Noise impacts and demolitions did not address the earth vibration and sound effects on nesting areas, particularly over time. It was not clear whether the mountain range and valley conditions were evaluated for echo and concentrated noise impacts. The Native population has already exhibited a disproportional level of hearing loss, particularly in Eklutna. Sedimentation from military activities was well noted in the document, however, how this would affect the ability of Salmon to procreate was entirely overlooked. Sedimentation would definitely negatively effect Salmon populations throughout the area. The effect on Beluga would follow. All wildlife habitats tend to migrate from season to season. Military activity on military land does not isolate the impact to habitat on military land alone. Should moose have to relocate due to disturbances, for instance, their reproduction tends to be reduced. Subsistence is a very misunderstood lifestyle, which your EIS failed to capture. We hope to educate you more fully on this subject as we continue to work together and exchange information.

Housing focused on total availability rather than the extreme shortage of low-income, affordable housing conditions that exist now. An increased population by others would also negatively impact our tribe, by decreasing our resources, our voice, and ability to overcome the numerous social issues that are already present.

Military retention rate in Alaska is very high. This was not addressed. About 40% stay after leaving the military, increasing with family growth.

Those are just a few notes. We were grateful for the many mitigation suggestions proposed by the Army to resolve some of the problems. However, we would like tribal consultation to be included on each component where mitigation is proposed. It is wonderful to see the amount of policy and regulation that the Army imposes upon itself to correct any negative impact. We realize that policies and regulations do change over time and we would most definitely like to give our input on those as well. We are thankful that the Army has taken such positive steps already to work with us and look forward to strengthening that important relationship. Let us know what else we might do to help.

Sincerely, Maria D.L. Coleman – Native Village of Eklutna

Socioeconomics 08

In recent years, Fort Richardson personnel have been offered government on-post housing soon after their arrival in Alaska. High housing availability in the Anchorage area coupled with a relatively low reliance on off-post housing results in only a small proportion of the Anchorage housing market affected by Army personnel. The Army also intends to upgrade and expand its housing through a series of construction projects detailed in the Family Housing Master Plans for Fort Richardson and Fort Wainwright (USARAK 2003a,b).

Socioeconomics 09

Statistics at Fort Richardson indicate a ratio of 1.2 retirees and retiree family members per uniformed military. This would mean a population increase of no more than one tenth of one percent in Anchorage. At Fort Wainwright, the retirement ratio is 0.2.



Cheesh-na Tribal Council
P.O. Box 241
Chistochina, AK 99586
(907) 822-3503/822-5179 FX

03-CTC-369

September 8, 2003

Amanda M. Shearer, Native Liaison
Department of the Army
Headquarters, US Army Garrison, Alaska
600 Richardson Drive #6500
Fort Richardson, AK 99505-6500

Dear Ms. Shearer,

Cheesh-na Tribal Council is submitting comments on the Draft Environmental Impact Statement on the transformation of the US Army Alaska.

Subsistence is a major component of the native way of life and how we carry on our traditions and livelihood of our people for the present and future. We ask that this be taken seriously for future and current projects that the Department of Army is doing. This consists of berry picking areas that are utilized, they not be disturbed or contaminated, most of these consist by roadsides. We ask that the usage be decreased in these areas until after fall time, when blueberries are harvested. Hunting and trapping are of importance and it is asked that individuals be allowed access on DOA lands.

Culture Resources and artifacts that are found must be directed to the appropriate tribal agencies. For many years collectors have become wealthy on our artifacts that are found and sent to museums. Gravesites have been removed and vandalized.

We ask that the DOA take into consideration the appropriate planning for the next 10, 20, 30 years and that the impact is well thought out and researched. The economies in the affected areas take a long time to adjust to sudden increase in populations, only to have it decrease in a few years. The attitude and ways of the people moving in can greatly affect a community, usually in negative areas such as increased drug and alcohol uses, crime, inflation, etc.

It has been noted by many that the DOA personnel that come to Alaska a need to attend training that enhances their knowledge of Alaska, it's traditions and history. Many are insensitive to areas that they use and how they utilize these areas' resources.

Subsistence 04

We acknowledge the importance of subsistence. Please see Sections 4.14, Public Access and Recreation and 4.15, Subsistence. Impacts have been revised since the Draft EIS.

Cultural Resources 02

Per the National Historic Preservation Act, any artifacts found must be turned over to a certified collection for curation; in our case, this is the museum at the University of Alaska, Fairbanks. Per the Native American Graves Protection and Repatriation Act, all materials associated with graves must be turned over to the appropriate Tribe.

Socioeconomics 10

The cost of living in both Fairbanks and Anchorage has fallen as population has increased. Slow and steady growth in places such as Anchorage and Fairbanks has brought the relative cost of living down. Larger population allows for economies of scale in product delivery. Further reductions in cost of living can be expected with a greater military presence. For example, more and larger discount retailers may move into Fairbanks and Anchorage.

Section 3.13 identified the USARAK community as having a lower propensity for crime than the state or Anchorage and Fairbanks communities. Thus, transformation would reduce the relative incidence of crime and could reduce the overall incidence of crime through greater economic opportunity. On the other hand, heavy alcohol and illicit drug use among Army personnel is higher than that for their demographic counterparts in the civilian population. This is expected to be a minor impact. Please see full discussion in Sections 3.13 and 4.13, Socioeconomics.

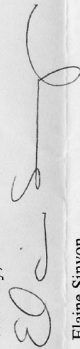
Environmental Awareness 07

Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2. USARAK's Native Liaison will continue to work with Tribes to address this concern. Please refer to Sections 3.9 and 4.9, Wildlife and Fisheries, and Section 2.2.3.7 for specific mitigation measures. In addition, please see INRMPs for ongoing Army procedures to protect and preserve natural resources.

We ask that there be a process to deal with the issues or any others that may come that affects our tribal community and our resources. The Tribal Councils need to be kept fully appraised and if any questions should arise, the DOA needs to notify tribes if their assistance is needed. It has been only in the past few years that tribal councils are being asked for information and assistance in planning purposes. The greatest damage took place years ago with no thought to the impact that we are seeing today.

Thank you for allowing us to submit our comments, if there are any questions, please do contact me at (907) 822-3503.

Sincerely,



Elaine Sinyon
Tribal Administrator

Cc: Cheesh-na Tribal Council

Subsistence 05

USARAK's Native Liaison will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like transformation. We always encourage dialogue on how USARAK can work more closely with Tribes.

U.S. ARMY GARRISON - ALASKA
STRYKER BRIGADE COMBAT TEAM TRANSFORMATION AND
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tribe: Healy Lake
Name: BEN SAKOR

This comment sheet provides a framework for evaluating concerns that you may have regarding the Stryker Brigade Combat Team Transformation Draft Environmental Impact Statement (DEIS). U.S. Army Garrison - Alaska will incorporate these and any future comments you may have to ensure that Tribal concerns are addressed in the development of the final EIS.

Please return these or any other comments to:

U.S. Army Garrison-Alaska
Attn: APVR-RPW-EV (Amanda Shearer)
730 Quartermaster Road
Fort Richardson, AK 99505-6500

You may also fax comments to (907) 384-0283.

1. Please share your concerns/questions regarding any of the following areas that are addressed in the SBCT Draft Environmental Impact Statement:

- Land & Air Use

- Air Quality

- Geology/ Resources

• Socioeconomic Resources

- Subsistence *The Army needs to ~~have~~ educate their people on how to respect the land & animals when their hunting or fishing in ~~the~~ Alaska.*

• Noise

• Human Health & Safety

• Environmental Justice

Environmental Awareness 08

Mitigation includes an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. Please see Section 4.15.6.2. USARAK's Native Liaison will continue to work with Tribes to address this concern. Please refer to Sections 3.9 and 4.9, Wildlife and Fisheries, and Section 2.2.3.7 for specific mitigation measures. In addition, please see INRMPS for ongoing Army procedures to protect and preserve natural resources.

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9.4.2 Government, Agency, and Non-Governmental Organizations Comments and Army Responses

To Whom It May Concern:

The Alaska Department of Natural Resources (ADNR), Office of Habitat Management and Permitting (OHMP) in Fairbanks has reviewed the draft Environmental Impact Statement for the Transformation of U.S. Army Alaska. I have only one comment – Figure 3.3a Terrain, Surface Water, and Fishing Areas at Fort Wainwright – I would like to see the entire lengths (depicted on the map) of the Tanana River and the Chena River highlighted as anadromous streams. Both streams flow through (and border) military lands and support anadromous fish and would require a Fish Habitat Permit from the OHMP for work conducted along side, in, or over.

Wildlife and Fisheries 12

Figures have been modified to address this comment. Please see Appendix A, Figures 3.3.a and 3.3.c.

If you have any questions, please call. Thank you for the opportunity to comment.

Sincerely,

Nancy Ihlenfeldt
Habitat Biologist
ADNR, Office of Habitat Mgmt & Permitting
907-459-7287

United States Department of the Interior
Office of the Secretary
Office of Environmental Policy and Compliance
1689 C St, Room 119
Anchorage, AK 99501-5126

September 5, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV (Gale Skaugstad)
1060 Gaffney Road #6500
Fort Wainwright, AK 99701-6500

Dear Ms. Skaugstad:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (EIS) for the Transformation of the U.S. Army Alaska-Transformation of the 172nd Infantry Brigade (Separate) to a Stryker Brigade Combat Team (SBCT),

Forts Wainwright and Richardson, Alaska. We offer the following comments for your consideration.

GENERAL COMMENTS:

We believe the Final EIS needs to provide additional water resources information to allow a detailed evaluation of baseline conditions and potential impacts of proposed action alternatives on the water resources of the project areas. For example, much of the information used in the Draft EIS to describe baseline surface-water quantity and quality is out of date; some is qualitative; and some is derived from streams and rivers that are not representative of those in the study areas. Similarly, information used to describe ground-water flow, movement and direction, use, and quality is insufficient. In addition, some sections of the Draft EIS, particularly the “Groundwater” section of Chapter 3, Affected Environment, and Chapter 4, Environmental Consequences, need to be rewritten for clarity regarding ground-water concepts and for accuracy of hydrologic-term definitions.

We agree with the proposal in the Draft EIS for the collection of supplemental surface- and ground-water data where none are available in the study areas as part of the water-resources monitoring program. To improve descriptions of baseline conditions and impacts of proposed alternatives, we suggest that a supplemental reconnaissance-level data-collection effort (surface-water quantity and quality, ground-water levels and water quality) be completed and the findings incorporated into the Final EIS.

SPECIFIC COMMENTS:

Page 3-41, Chapter 3 Affected Environment, Section 3.5 Surface Water, Subsection 3.5.4 Fort Richardson, Subsection 3.5.4.4 Water Quality, last paragraph:

The statement “Most of the pollutants entered Ship Creek as non-point sources from ... downstream of the post.” is not substantiated in the text. No data are provided for Ship Creek leaving the post, nor are data provided for Ship Creek at station 15276000 for the contaminants listed in the text. We recommend that the statement be substantiated with data or by reference to a published work.

Page 3-43, Chapter 3 Affected Environment, Section 3.6 Groundwater:

Several of the definitions in this paragraph, including transmissivity and confined [aquifer], are inaccurate. Standard definitions can be found in basic ground-water hydrology texts, such as those authored by Freeze and Cherry (1979), Driscoll (1986),

Surface Water 01

Text has been modified to address this comment. Please see Section 3.6, Groundwater. The Alaska Department of Environmental Conservation (ADEC) report indicates the pollutant source as non-point source pollution due to increased urbanization in the lower watershed (ADEC 1998).

Groundwater 01

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

or Todd (1980). We suggest that the section include definitions and properties of confined and unconfined aquifers, gradient, and transmissivity, and the relation of these characteristics to quantity of flow and rate of movement.

Page 3-43, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.1.1 Groundwater Flow:

The first sentence is misleading. Ground-water flow is not a reliable indicator of quantity. Flow is affected by steepness of gradient and by aquifer transmissivity. Quantity is affected by aquifer thickness and aquifer porosity. We recommend that the paragraph be rewritten.

The second paragraph needs to explain how flow data can be used to determine whether an aquifer is confined or unconfined. As currently written, the connection between confined or unconfined is tenuous, and the definitions are inaccurate.

Page 3-43, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.1 Groundwater Topics, Subsection 3.6.1.2 Groundwater Quality, first sentence:

The first sentence is ambiguous. We recommend that it be rewritten to indicate whether it means, for example, the same types of data are available (that is, the same constituents were monitored on the same dates in both systems) or the values are identical, which could indicate a very good hydraulic connection between the ground- and surface-water systems, or some other linkage.

Page 3-43, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.1 Groundwater Topics, Subsection 3.6.2.1 Groundwater Flow:

We believe this section should be rewritten for clarity ("Groundwater...is classified as an alluvial aquifer,?") and expanded to include information about infiltration, recharge, and discharge of ground water. The subsection should also include information about effects on permafrost; for example, changes to permafrost could impact infiltration, flow direction, and flooding potential.

Page 3-45, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.2 Fort Wainwright, Subsection 3.6.2.2 Groundwater Quality, first through fourth paragraphs:

Concentrations of measured parameters are only summarized. We recommend the addition of a table in the Final EIS that includes the detailed concentration data for parameters from each of the wells and the date the data were collected.

Groundwater 02

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

Groundwater 03

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

Groundwater 04

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

Groundwater 05

Text has been modified to address this comment, according to availability of data. Please see Section 3.6, Groundwater.

Groundwater 06

Data was included as available. Please see Appendix E.

Page 3-45, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.2 Fort Wainwright, Subsection 3.6.2.2 Groundwater Quality, third paragraph:

The paragraph is unclear. We recommend that the document identify what constituent is being discussed.

Page 3-45, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.3 Donnelly Training Area, Subsection 3.6.3.1 Groundwater Flow, last paragraph, second sentence:

We suggest rewording this sentence to avoid the use of the word “perched,” which has a specific meaning with respect to ground-water aquifers. The streambeds could be described as being located above the water table or above the saturated zone.

Page 3-46, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.3 Donnelly Training Area, Subsection 3.6.3.1 Groundwater Flow, second paragraph:

This paragraph, which states that the streams are gaining water from the alluvial aquifer system, contradicts the previous paragraph, which states that the streams are losing water to the ground-water system. We recommend that the two statements be reconciled if, for example, the difference in recharge/discharge conditions are seasonal. We further recommend that a figure identifying gaining and losing reaches be included in the Final EIS so the location of these features in the study area can be discerned.

Page 3-46, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.3 Donnelly Training Area, Subsection 3.6.3.1 Groundwater Flow, third paragraph, first sentence:

We suggest the word “move” be replaced with “is located,” to clarify that the elevation of the water table is varying with space, not fluctuating over time.

Page 3-46, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.3 Donnelly Training Area, Subsection 3.6.3.1 Groundwater Flow, third paragraph, last sentence:

The sentence is repeated in the following paragraph. This redundancy should be eliminated.

Page 3-46, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.3 Donnelly Training Area, Subsection 3.6.3.2 Groundwater Quality, first paragraph:

Groundwater 07

Text has been modified to address this comment. Please see Section 3.6, Groundwater. Constituents at these sites involved primarily hydrocarbons and chlorinated solvents.

Groundwater 08

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

Groundwater 09

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

Groundwater 10

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

Groundwater 11

Text has been modified to address this comment. Please see Section 3.6, Groundwater.

We recommend that quantitative results of the investigations referenced in this paragraph, including the types and extent of contamination discovered, be included in the Final EIS.

Page 3-46, Chapter 3 Affected Environment, Section 3.6 Groundwater, Subsection 3.6.3 Donnelly Training Area, Subsection 3.6.3.2 Groundwater Quality, second paragraph:

We believe that the actual concentration values should be provided. Environmental impacts could occur and because initial values are so low, the concentrations could increase substantially yet still fall within the state standard.

Page 4-45, Chapter 4 Environmental Consequences, Section 4.6 Groundwater, Subsection 4.6.2 Review of the Impacts to Groundwater, fourth bullet:

This statement is a definition of “persistence” and not a source of impact; therefore we suggest it be deleted.

Page A-16, Appendix A, Figure 3.6.a and b, Groundwater Maps:

We suggest adding to the maps, ground-water flow direction information to indicate whether these wells are up- or down-gradient from the post.

We appreciate the opportunity to comment on this document. Mr. Steve Frenzel (907-786-7101) is the contact if you have questions concerning these comments.

Sincerely,

[Signed]

**Pamela Bergmann
Regional Environmental Office-Alaska**

REFERENCES:

- Driscoll, Fletcher D., 1986, Groundwater and Wells, Johnson Division, St Paul, MN, 1089 p.
Freeze, R. Allan and John A. Cherry, 1979, Groundwater, Prentice-Hall, Englewood Cliffs, NJ, 604 p.
Todd, David K., 1980, Groundwater Hydrology, John Wiley and Sons, New York, NY, 535 p.

Groundwater 12

Text has been modified to address this comment, according to availability of data. Please see Section 3.6, Groundwater, and Appendix E.

Groundwater 13

Text has been modified to address this comment, according to availability of data. Please see Section 3.6, Groundwater, and Appendix E.

Groundwater 14

Text in Section 4.6, Groundwater, was clarified to explain context of “persistence” as an impact.

Groundwater 15

Figures have been modified to address this comment. Please see Appendix A, Figures 3.6.a and 3.6.b.

Fairbanks North Star Borough *Office of the Mayor*
 809 Pioneer Road • PO Box 71267 • Fairbanks, Alaska 99707-1267
 907/459-1300 • Fax 907/459-1102 • Email mayor@co.fairbanks.ak.us

Gale Skaugstad
 Public Outreach Coord
 Enviro Res Dept
 Building 3023, Engineer Place
 Fort Wainwright, AK 99703

The Fairbanks North Star Borough values its USARAK neighbors and wishes to take this opportunity to express its support of the Army's Transformation. Further, we wish to state our support of EIS Alternative 4: the full Transformation of the 172nd Infantry Brigade at Forts Wainwright and Richardson, Alaska into a Stryker Combat Team (SBCT), add new infrastructure, and add the new Airborne Task Force.

Our evaluation of the EIS leads us to believe that this is the best alternative for the nation, the state of Alaska, and for the Fairbanks North Star Borough. It would facilitate the Transformation of the Army and result in improved environmental management of USARAK lands, a win-win for the nation, the state, and the borough.

Thank you for this opportunity to comment on the EIS, please feel free to contact us with any further questions.

Kathryn E. Dodge

Kathryn Dodge, Ph.D.
 Economic Development Division
 Fairbanks North Star Borough

Cc: Mayor Rhonda Boyles

Email September 8, 2003:

I have reviewed portions of the draft EIS, Transformation EIS U.S. Army Alaska. Although I found references to the requirements to meet General Conformity and statements such as "little or no impact on existing air quality," I did not find the actual applicability analysis that demonstrates that these projects fall below 100 tons per year CO in a given nonattainment area. Both Fort Wainwright and the Port of Anchorage projects may impact CO nonattainment areas. Temporary impacts, including

Alternatives 01

Thank you for your comment.

Air Quality 01

Two SBCT construction projects are located within nonattainment areas. A Record of Non-Applicability (RONA) was prepared for the company operations facility on Fort Wainwright, and a conformity analysis and RONA would be completed for the Port of Anchorage project at a future date, before construction begins. These analyses will be available upon request.

construction, as well as direct and indirect impacts under the control of the federal government must be quantified. Please let me know if this information is available or if the general conformity requirements are to be addressed at a later date. Thank you for the opportunity to comment.

Barbara E. Shepherd, ESIII
Alaska Dept of Environmental Conservation
Air & Water Quality
410 Willoughby Ave, Suite 303
Juneau, Alaska 99801
(907)465-5176

September 8, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV (Gale Skaugstad)
1060 Gaffney Road #6500
Fort Wainwright, AK 99703-6500

RE: U.S. Army Alaska Transformation
Environmental Impact Statement

The Alaska Department of Transportation and Public Facilities (ADOT&PF) has reviewed the Draft Environmental Impact Statement (EIS) for the Stryker Brigade and has comments regarding the relationship of this document to the proposed Knik Arm Crossing and the potential impacts to State highways.

The Department is initiating the environmental phase of the Knik Arm Crossing bridge project. Alternatives for the exact alignment of the bridge and connecting roads will be determined in this phase. It is anticipated that the road will connect to the Port of Anchorage. Currently we are doing geotechnical and geophysical work in Knik Arm in the general area of Cairn Point. A potential bridge in this general area has been of interest and will undoubtedly be considered in the development of alternatives. Coordination of the Stryker Brigade deployment at the Port of Anchorage and the Knik Arm Bridge projects will be important. Please coordinate with George Wuerch, Chair, Knik Arm Bridge and Toll Authority (KABTA) Board. He may be contacted through the Central Region Director's office at 269-0770.

Since the Stryker Brigade could potentially be using State highways, we have the following comments:

- 1) Convoys are subject to permitting. The units will be responsible for obtaining the proper permits.
- 2) The State has load limits on roadways, which need to be observed. The EIS does not adequately address the impacts to the road surface and associated damage from the convoys.
- 3) As presented in EIS, the 30-minute convoy separation may be unrealistic.
- 4) Based on convoy frequency predictions, traffic will be directly impacted.
- 5) Any training conducted on or involving public highways needs to be directly coordinated with ADOT&PF.

Thank you for the opportunity to comment on the draft EIS. If you have questions about our comments, please contact me at 269-0512.

Sincerely,

Jennifer W. Witt, AICP
Regional Planning Manager

Human Health and Safety 03

USARAK will continue using the existing convoy permitting process with ADOT&PF.

Human Health and Safety 04

Equivalent Axle Loads (EALs) have been computed for the Strykers. These would add approximately 300-350 EALs per year to the Alaska highway system. This represents a fraction of a percent of current annual EALs.

Human Health and Safety 05

USARAK will make extended efforts to follow all convoy regulations and additional procedures to mitigate potential impacts to traffic.

Human Health and Safety 06

Analysis indicates a direct impact to traffic. Please see Section 4.17, Human Health & Safety.

Human Health and Safety 07

Convoy transport between USARAK lands will continue to be coordinated with the Alaska Department of Transportation and Public Facilities through the permitting process. All training would occur on USARAK lands.

Northern Alaska Environmental Center
Conservation's Northern Voice

September 8, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV (Gale Skaugstad)
1060 Gaffney Road #6500
Fort Wainwright AK 99703-6500
USARAK_EIS@cemml.colostate.edu

To Whom it May Concern:

Please accept the following public comments regarding the U.S. Army Alaska Transformation Draft Environmental Impact Statement (DEIS) on behalf of the Northern Alaska Environmental Center. We value the opportunity to take part in this process, and we appreciate the commitment to the protection of natural resources expressed in USARAK documentation.

The Northern Alaska Environmental Center is a 501(c)(3) nonprofit organization dedicated to improving local knowledge of and commitment to environmentally sound practices here in the interior and northern part of the state. The organization was founded in 1971 by dedicated local citizens, and has continued as a grassroots education and advocacy group ever since. We currently have approximately 1150 members.

Due to our location and our regional organizational focus, our comments are largely focused on impacts to the Fort Wainwright training area on the Tanana Flats, and the Yukon training area, although many of our comments and concerns are equally pertinent to the other areas covered by the DEIS.

Aspects of the DEIS that are particularly valuable from our perspective include the following:

- Excellent clear maps make it easier for the public to understand the issues at hand
- Mitigations efforts include surveys, long-term monitoring, repair and revegetation
- Environmental limitation maps are in use, and will continue to be used
- Continued use of the INRMP, including restrictions on recreational vehicles
- Proposed wetlands database and case-by-case additional mitigation efforts
- Proposed study of recreational vehicle damage to wetlands
- Proposed maneuverability analysis of Tanana Flats

Other 03
Thank you for your comments.

- Proposed monitoring of military training and noise impacts on wildlife
- Proposed information and education program for personnel using USARAK lands

The DEIS makes it clear that the No Action Alternative is unlikely to be the alternative selected, given the perceived importance of upgrading Alaska's training facilities.

Thus, although the No Action alternative would be preferable from the point of view of the conservation mission of our organization, we will direct our comments at the remaining three options, focusing on ways in which we feel environmental information could be more complete and environmental impacts could be lessened under any or all of these three contingencies.

Our greatest concerns regarding all the proposed upgrade options (excluding the no action alternative) relate to the foreseen and potentially unforeseen impacts on wetland soils and vegetation, and on fish, wildlife and wildlife habitats. These concerns include the following, all of which will be discussed in greater detail later in this comment letter.

1) Soil/Wetland/Vegetation impacts

- Assumptions regarding impacts based on existing access conditions, with no stipulations dealing with potential changes in access
- Immediate and cumulative impacts of wheeled Stryker vehicles, including unforeseen impacts due to these vehicles' lack of prior use in the state
- Bankside erosion along waterways that may impact fish and game habitat
- Lack of information on long-term rehabilitation of wetlands
- Inadequate mitigation of impacts, particularly in relation to limiting access until frost depths and snow depths permit low-impact travel
- Impacts of increased ORV use by army personnel and the general public associated with larger numbers of personnel deployed and trail creation by army vehicles

2) Wildlife/habitat impacts

- Lack of adequate ecological knowledge needed to predict impacts for some species and some situations
- Specific impacts on wolverine, wolf, bear(s), waterfowl, raptors, other birds
- Uncertainty of cumulative and long-term impacts on ecosystem health
- Changing fire patterns, including reduced fires due to increased suppression, and the effects of these changes on habitat
- Fire mitigation that includes road-building and other means that are potentially degrading to habitat
- Impact of increased troops and increased access by the general public on animals that are hunted and trapped, as well as species that are sensitive to human and

Alternatives 02

Thank you for your comment.

ORV proximity

- Noise impacts on sensitive species
- Toxic effects of munitions on sensitive species

1) Soil/Wetland/Vegetation impacts

While the EIS offers a great deal of useful detailed information on potential impacts to soils, wetlands, and surface vegetation, some information is lacking, and mitigation standards are in some cases inadequate.

As explained in the DEIS (p. F-7) Stryker vehicles have never before been used in Alaska. Moreover, they have been shown under testing conditions to have very high impacts on weak soils (p. F-9) – higher impacts than any currently used army vehicles in the state. The EIS states that Stryker vehicles can impose severe damage on wetlands and weak soils even when deep frost levels are present, if there is little or no snow cover.

We feel that the US Army, representing our country's national government, should uphold standards at least as high as those imposed upon private industry. Thus, we suggest that the US Army should, as a minimum standard, follow the same rules followed by the petroleum industry when working on tundra soils on Alaska's north slope. Currently, these standards do not allow heavy machinery to cross the tundra until there are at least 6 inches of snow cover and 12 inches of hard frozen ground.

Furthermore, many assumptions about the on-the-ground impacts of Stryker vehicles and other heavy equipment are based on current assumptions about access. As of September 2003, there is no bridge across the Tanana River to access the Tanana Flats. However, there is no guarantee that such a bridge will not be constructed at a future date. Stipulations should be made explicit regarding what would and would not be allowed to occur on the Tanana Flats training area should a larger part of that area be made accessible year-round. Whenever possible, MIM should be reduced or kept to a minimum even under low-impact conditions.

We appreciate efforts that are being made to limit recreational and civilian impacts to US Army lands. Off-road vehicle use should not be allowed under conditions that would degrade wetlands, soil quality, or vegetation. To further this caused, proposed education programs for USARAK personnel should also be made available to public users of USARAK lands.

2) Wildlife/habitat impacts

Maneuver Impacts 06

Much of the tundra on USARAK lands is considered wetlands. Maneuver training in wetlands on Fort Wainwright and Donnelly Training Area must comply with conditions of USARAK's five-year general wetlands permit. See Appendix H for descriptions of these environmental limitations.

Maneuver Impacts 07

USARAK is undergoing an access feasibility study and is not currently planning on constructing a bridge. Existing USARAK use restrictions should suffice to protect sensitive areas.

As the DEIS states, potential impacts on the fish and wildlife on USARAK lands are largely unknown – particularly long-term and cumulative impacts. This includes the effects of habitat alteration and destruction; noise; water pollution; air pollution; and increased human presence. Each potentially deleterious impact should be studied, to the extent feasible, separately and in combination, in order to determine individual and cumulative impacts.

The DEIS covers impacts to a fairly wide range of species, but places emphasis on those used directly by humans for hunting and fishing. However, these species are indirectly reliant on smaller game and non-game animals. Some effort should be made to study potential impacts on a sampling of species beyond those already cataloged.

Indirect impacts on species may occur, in particular because impacts on predator species are predicted to be greater than impacts of prey species. Meanwhile, as stated in the DEIS, human hunting efforts are likely to increase and broaden in area due to increased army personnel numbers and increased trail-creation by army vehicles. Indirect effects of predation changes on species such as moose should be studied and accounted for.

As has become clear in many different ecosystems across the United States, fire suppression can, in the long term, be even more problematic than natural fires. Efforts to suppress fire should be tailored to match natural fire in the region; not all fires should be suppressed in fire-driven systems such as black spruce.

The suggestion that fire-fighting would necessitate additional road-building brings forward a host of other potential problems related to roads and access. Road-building should not be considered as a viable fire-control alternative.

Thank you once again for the opportunity to comment on this important proposal. We look forward to reading the Final EIS. Please let us know if you have any questions or comments.

Sincerely,

Arthur Hussey, Executive Director

Wildlife and Fisheries 13

For predicted impacts to these resources, please see Section 4.9, Wildlife and Fisheries. Please see Section 4.20 for a description of cumulative impacts.

Wildlife and Fisheries 14

The majority of species analyzed in Tables 4.9.a, 4.9.b, and 4.9.c are not managed for consumptive use. The species analyzed in greater detail were selected by the USARAK Ecosystem Management Team due to their conservation status or economic importance.

Wildlife and Fisheries 15

A significant gain or loss in predator populations could result in population-level effects on prey species such as moose or caribou. However, such changes in the dynamics are not expected.

Fire Management 01

Fire management options are determined by the Alaska Wildland Fire Coordinating Group, of which USARAK is a member, through the Alaska Wildland Fire Management Plan. Management options are selected based on evaluation of legal mandates, policies, regulations, resource management objectives, and local conditions. Please see Section 4.11, Fire Management, for more information.

Fire Management 02

Text has been modified. Please see Section 4.11.6, Fire Management.

*State of Alaska Department of Fish and Game
Headquarters, Anchorage Office
333 Raspberry Road
Anchorage, AK 99518-1599
PHONE: (907) 267-2339
FAX: (907) 267-2422*

Department of the Army
U. S. Army Garrison, Alaska
APVR-RPW-GS
730 Quartermaster Drive
Fort Richardson, Alaska
99505-6500
Attn: Kevin Gardner

Dear Mr. Gardner

The Alaska Department of Fish and Game (Department) has reviewed the Environmental Impact Statement (EIS) for the Transformation of US Army Alaska (USARAK). The EIS describes impacts to land uses, air, soil and water resources and fish and wildlife resources and their uses. Alternatives 3 and 4 describe transforming the 172nd Infantry Brigade (Separate) into a Stryker Brigade Combat Team (SBCT) and may include reassignment of the 501st Parachute Infantry Regiment. A comparison of Alternative 3 and 4 indicates Alternative 4 would result in higher personnel and equipment numbers and higher training intensity. Construction projects would be similar. Alternative 4 would fully fund and implement Integrated Training Area Management, environmental management and sustainable range management programs, with the intent to improve environmental management. Comments on the proposed activities follow.

General Comments

The EIS provides a thorough analysis of most anticipated impacts and detailed information on resources and operational differences under the various alternatives. In some cases environmental impacts appear to be downplayed and some impacts may be more significant than portrayed. These issues are addressed in specific sections below.

Specific Comments

Of most concern, is a proposed 33.8 mile fence planned for construction around portions of Fort Richardson. This construction is a major element of proposed activities at Fort Richardson that will significantly affect wildlife resources and public uses.

Fort Richardson Fence 01

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements.

Concurrent public review and comment for this activity is being addressed in a separate Environmental Assessment (EA) document (USARAK 2003). The public review, comment period and deadline for the transformation EIS and the fence EA are being conducted concurrently. The cost and potential environmental and social impacts of the fence represent a significant action. The proposed fencing activities should be clearly described and impacts analyzed in the draft EIS. National Environmental Policy Act (NEPA) regulations require examination of related actions in a single document, not in a piecemeal fashion. Thus, the draft EIS for the transformation of the USARAK is incomplete without including an analysis of the proposed Fort Richardson fence. We suggest all related construction proposed for Fort Richardson be included in the EIS.

USARAK considers the fence necessary to prevent unauthorized civilian access to training areas. We do not dispute that decision but offer information for consideration before implementing this decision. These large wooded areas are currently used by local runners, hikers, skiers, dog walkers, and nature enthusiasts. A fence built in the proposed location will impact current public access and recreation. The construction costs for the fence are estimated to be at least \$8 million based, in part, on the cost-per-foot to build a similar chain link fence on Elmendorf Air Force Base. Additional large annual expenditures will be required to monitor, repair and maintain the fence.

The proposed fence design and location will also impede wildlife movements and population sustainability, particularly of moose. Seasonal movements to wintering, rutting and calving areas will be affected. Trees cut from a zone along the fence to minimize damage represent a loss of habitat and creation of a natural barrier to animal movements. Proposals to provide only two gaps in the fence to facilitate wildlife passage are inadequate in number, design and location. A similar fence along Elmendorf Air Force Base and Glenn Highway was installed with at least 30 openings or gates to allow wildlife movements. The latter design was based on extensive cooperative efforts of Department and military biologists and engineers familiar with moose populations, movements and terrain. The significant impacts that would result from insufficient openings in the Fort Richardson fence design need to be addressed in the EIS.

We note that the proposed fence is inconsistent with the USARAK's fencing policy (USARAK 1998:14-13). This policy states:

14-3b Fencing Policy. All fences that hinder the natural migration or other movements of wildlife will be modified or removed, unless the purpose of the fence is to keep wildlife out of a given area. All new fences will be constructed with the objective of maintaining or improving wildlife

Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Fort Richardson Fence 02

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Fort Richardson Fence 03

USARAK is considering installation of a boundary fence for the cantonment area at Fort Richardson to further current and future force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Fort Richardson Fence 04

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

mobility in important habitat areas. Fence design will be such as not to impede wildlife movement or military training. (emphasis added)

Facilities

New facilities planned to house the increased numbers of personnel under Alternatives 3 and 4 will be constructed in previously disturbed areas. The Army should ensure that solid waste management plans, (i.e. garbage management) are in place at these new sites to eliminate any attractive nuisance situations for bears.

The construction of UAV facilities on 100 acres at Donnelly Training Area will need to be mitigated with approved projects identified and agreed to by state and federal management agencies.

Training Activity

The proposed increases in training activity for Alternatives 3 and 4 will impact wildlife resources. Increases in munitions requirements (between 52-83%), of maneuver space (between 80-106%), and MIMs (400-410%) represent serious potential impacts from a variety of sources to wildlife populations in the areas. We suggest that further efforts be made by the Army to coordinate with the Department in incorporating existing protective management plans and developing additional new plans that would minimize disturbances to wildlife during critical seasonal periods. Such efforts include timing of exercises to minimize activities in identified important seasonal use areas and reducing numbers of vehicles to previous levels for specific sensitive periods.

RS 2477 Rights-of-Way

A discussion of RS 2477 Rights-of-Way is noticeably absent from the EIS. The State of Alaska claims numerous roads, trails and paths across federal lands under Revised Statute 2477. The State of Alaska has identified a significant number of routes it believes qualify as RS 2477s throughout the state. We recommend that the Army contact the Department of Natural Resources to determine which RS 2477 Rights-of-Way are present in the area and list them in the final document.

Interagency Coordination

We disagree with the following statement on coordination between our agencies. “*The Army has worked directly with the Department of Fish and Game to define potential impacts of the proposed action and No Action Alternative on wildlife (see sections 3.9, 4.9, and Appendix E).*” (p. 1-13)

This statement does not accurately represent the level of discussion between the Army and the Department. The Army worked with the Department to identify wildlife resources, but there has been no discussion of potential wildlife impacts on military

Human Health and Safety 08

Overall solid waste management is governed by USARAK’s Integrated Solid Waste Management Plan (USARAK 1998).

Purpose and Need/Proposed Action 08

Text has been modified. The number of acres has been changed to 0.5 acres for construction of the UAV maintenance facility.

Wildlife and Fisheries 16

Thank you for your comment.

Infrastructure 01

The agency notes that Alaska statute identifies rights-of-way the State of Alaska claims under RS 2477. No specific federally-recognized RS 2477 right-of-way across USARAK lands is impacted by transformation activities, and therefore it is not discussed in this EIS.

Other 04

The Alaska Department of Fish and Game was invited to agency scoping meetings in February 2002 and for agency briefings of the Draft EIS in July 2003. In addition,

lands. As mentioned, one of the most significant wildlife impacts on Fort Richardson will be the construction of a perimeter fence, and the type and level of impacts were unknown until the draft EIS was produced. After receiving the draft EIS, the Department began working with the Army to define potential impacts. We look forward to continuing this cooperative effort

meetings with the Alaska Department of Fish and Game staff were held at the locations and times listed below:

June 24, 2003 Fairbanks
 June 26, 2003 Delta Junction
 July 15, 2003 Anchorage
 July 17, 2003 Fairbanks
 July 18, 2003 Fairbanks
 July 22, 2003 Delta Junction
 August 15, 2003 Anchorage

Please see Appendix F for additional information on these meetings.

Affected Environment

Surface Water – Surface water impacts described in Alternatives 3 and 4 would range from minor to possibly severe bank erosion on a case-by-case basis, with the overall effect being moderate bank erosion. The Department supports proposed mitigation procedures to establish protective buffer zones within 10 yards of surface waterways. We strongly encourage the adoption of this proposed mitigation and recommend that the buffer zone be expanded to correspond with established buffers along waters known to have anadromous and/or high value resident fishes. For example, State of Alaska forest practices regulations require buffers to be from 66 to 100 feet wide for anadromous fish waters. The Department also supports an increase in base line water quality monitoring to be implemented for Alternatives 3 and 4. We support the Army's determination of eliminating firing high explosive munitions into active river channels.

Wetlands

Wetlands impacts described in Alternatives 3 and 4 would range from moderate to possibly severe impact to wetlands on a case-by-case basis, with the overall impact being moderate. The Department strongly supports proposed mitigation to assess the need for additional permits for activities on wetlands described for Alternatives 3 and 4. Stipulations in these permits would provide the best opportunity to mitigate potential impacts into the future. The Army should coordinate with the Department in development of permit stipulations for wetlands protection. The Department has extensive experience in the development of operating guidelines for the protection of wetlands and other sensitive habitats. The Department fully supports studies on the impact of vehicles on wetlands. Even further, we suggest the Army review completed studies conducted in Alaska and elsewhere and implement protective measures identified to minimize wetlands damage. These measures would include no vehicle entry closures and additional zoning and seasonal timing restrictions. Mitigative measures instituted prior to activities would ensure minimal impacts to wetlands and surface waters.

Surface Water 02

No tracked or wheeled maneuvering is permitted within a 50-meter buffer around all streams, lakes, and any open flowing water during the summer unless crossing at a 90-degree angle to the stream. Fish spawning streams will not be crossed during the summer. Existing buffer zones are indicated on Figures 3.7.a, 3.7.b, and 3.7.c for summer environmental limitations overlays. For further information, please see INRMPs and training regulations (AR 350-2) in Appendix H.

Wetlands 01

Thank you for your comment.

Vegetation

The draft EIS assessment of impacts to forest resources in Alternatives 3 and 4 would range from moderate to possibly severe impacts on a case-by-case basis, with the overall impact as moderate. The Department agrees that studies on the impact of vehicles on vegetation should be funded and pursued. However, we urge the Army to review current literature and determine what research and information has already been conducted in this area. We believe that this review will reveal useful and interesting information about vegetative impacts that would assist in the identification of areas for additional study.

Wildlife

Impacts to wildlife will be significant based on the increases in personnel, training, vehicular use and recreation identified in the EIS. Increased training requirements for munitions, maneuvering space and MIM's represent significant levels of disturbance to sensitive species. The disruption of activity cycles and sensitive seasonal periods such as calving or nesting could affect individuals and, if activities were extended over the entire period, could affect population levels.

Direct mortality could occur from vehicular collisions due to increased training levels. Waterfowl use of Eagle River Flats could be affected by increased artillery training. Future increases in waterfowl mortality could result from use of phosphorus-containing munitions. An increase in personnel levels will also impact wildlife and fisheries as a direct result of increased harvest levels.

The EIS lists hunting and trapping seasons and harvest limits for Fort Richardson in Table 3.9.e. Fort Richardson is a distinct state management area within Game Management Unit 14C. State hunting regulations (5 AAC 92.530[1]) allow the taking of big game (i.e., moose, brown and black bears, Dall sheep, wolf, and wolverine) by permit only. Additional seasonal and harvest restrictions may be added by military staff.

Please add to Table 3.9.e the late-season moose hunt (December 16-January 15), and add "1 bull by muzzleloader only" to the harvest limit.

We request additional corrections in this section as follows:

- "Most resident bears are thought to be females and their cubs (Bostick 1997)." (p. 3-86)

Bostick's research activities were focused on Elmendorf AFB and involved tagged or radio-collared bears. Study design did not include a representative population sample,

Maneuver Impacts 08

Thank you for your comment.

Wildlife and Fisheries 17

Text has been modified to address this comment. Please see Section 3.9, Wildlife and Fisheries.

and most of these known bears were females and their cubs. Not enough is known about the age and sex structure of the Fort Richardson bear population to make this statement, thus, it should be deleted.

- “Black bears are not hunted on [Fort Richardson], but most cases of adult mortality appear to be caused by humans.” (p. 3-86)

Insufficient information is available about Fort Richardson black bear population dynamics, including causes of mortality to make this statement. This sentence should be deleted.

- “Between 1990 and 1999, 67 black bears were killed in the Anchorage area (including [Fort Richardson]) due to Defense of Life and Property kills (Kleckner 2001).” (p. 3-86)

Department records show only 2 black bears shot in defense of life or property on Fort Richardson in the 1990s. Please revise the sentence to more accurately reflect the low number of bears shot on Fort Richardson compared to other parts of the Anchorage Bowl.

- “Surveys indicate that three to five grizzly bears use lands on [Fort Richardson] and Elmendorf Air Force Base.” (p. 3-86)

No scientific surveys have been conducted on Fort Richardson or Elmendorf AFB to determine brown bear numbers. Department biologists identified tracks of at least 8 brown bears while conducting stream surveys along the North and South Forks of Campbell Creek adjacent to the Fort Richardson boundary. These bears, as well as brown bears fishing sloughs and tributaries of Eagle River, probably extend their ranges onto Fort Richardson. The Department estimates at least 10 brown (or grizzly) bears use lands on Fort Richardson annually.

- “The North Anchorage moose herd, which frequents [Fort Richardson] and Ship Creek, has remained relatively stable at an estimated population of 525 to 650 animals (Quirk 2001).” (pp. 3-86, 3-87)

Moose seasonally congregate in feeding or rutting areas, and are more accurately referred to as a population rather than a herd. The Anchorage area moose population is not stable. Moose surveys on Fort Richardson and adjacent areas of Elmendorf AFB and upper Ship Creek show considerable annual fluctuations. The Fort Richardson moose population has ranged from a high of 622 in 1994 to a low of 340 in fall 1996. The 1996 count was 2 years after a record harsh winter and was likely even lower in

Wildlife and Fisheries 18

Text has been modified to address this comment. Please see Section 3.9, Wildlife and Fisheries.

Wildlife and Fisheries 19

Text has been modified to address this comment. The text shows that only 2 of the 67 bears were shot on Fort Richardson. Please see Section 3.9, Wildlife and Fisheries.

Wildlife and Fisheries 20

Text has been modified to: “No scientific surveys of grizzly bears have been conducted at Fort Richardson, but Alaska Department of Fish and Game estimates that approximately 10 bears use lands on the post each year.” Please see Section 3.9, Wildlife and Fisheries.

Wildlife and Fisheries 21

Text has been modified to: “According to the Alaska Department of Fish and Game, the moose population around North Anchorage, including Fort Richardson and Ship Creek, has varied substantially over the past decade and has ranged from 622 in 1994 to 340 in 1996. Declines have occurred during extreme winters when snow packs are persistent and deep. The combination of high densities (>500 moose) and heavy snow pack (>3

fall 1995. These large fluctuations (i.e., a 45% decrease from fall 1994 to fall 1996) are consistent with a population that has exceeded its carrying capacity. We anticipate future large periodic fluctuations due to winterkills, particularly if the population exceeds 500 moose and snow pack exceeds 3 feet or has a thick crust for long periods.

- “...*bottle-nosed dolphins (Tursiops truncatus)...*are sighted occasionally.” (p. 3-87)

Bottle-nosed dolphins generally do not range north of Puget Sound (Rice 1998). We are not aware of any observations in Cook Inlet.

Environmental Consequences: Wildlife and Fisheries

The analysis of environmental consequences under the three alternatives appears to be largely accurate except for the proposed fence and impacts to moose. Moose are already displaced by training and infrastructure in some portions of their range (USARAK 1998). Moose both tolerate some disturbance, and also avoid some disturbances, including hikers, skiers, and soldiers on maneuver (Andersen et al. 1996, Colescott and Gillingham 1996, Ferguson and Keith 1982). Similar research on other deer species (e.g., elk, white-tailed deer) and other ungulates (e.g., bighorn sheep, mountain goat, chamois) show similar patterns of avoidance. Because of this avoidance behavior, impacts to moose under the “no-action” alternative should be considered minor-moderate. Increased maneuver and weapons training described under Alternatives 3 and 4 is likely to have a moderate effect.

Moose are the most numerous large wild mammal on Fort Richardson, with the population occasionally exceeding 600 individuals. Moose movements are generally east and west between the mountains and the lowlands in the Anchorage Bowl several times a year for calving, rutting, post-rut concentrations, and wintering (McDonald 1991). Prior to construction of the moose fence along approximately 3.3 miles of the Glenn Highway, moose from Fort Richardson crossed the highway an estimated 1,400-1,800 times per year (McDonald 1991). The existing fence along the Glenn Highway has modified moose movement patterns. Expanding that fence along the entire western and southern boundary of the post will have a severe impact on the Fort Richardson moose population and moose in general in Game Management Unit 14C. Some moose will move around the ends of the fence, but others will be prevented from fully using their home range. Moose on the mountain side of the fence will be prevented from moving to low elevation winter range and face a serious threat of winter starvation. Similarly, moose on the lowland side of the fence with traditional calving or other seasonal use areas in the mountains will be prevented from those movements. Separations between cows and newborn calves will likely increase because of the fence and the long distances between wildlife openings. We encourage the Army to

feet for an extended period) can lead to population crashes.” Please see Section 3.9, Wildlife and Fisheries.

Wildlife and Fisheries 22

Text has been modified to address this comment. Please see Section 3.9, Wildlife and Fisheries. This statement was removed from the document.

Fort Richardson Fence 05

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

reevaluate the opportunities for animal movement through the fence and cooperate with the Department in the development of adequate and functional wildlife openings.

Recreational Activities: Fishing and Hunting

The EIS incorrectly states: “General recreational usage data is unavailable for Fort Richardson.” (p. 3-133)

Fort Richardson supports more recreational use than all other USARAK Alaska installations combined. The draft EIS lists military police records estimating 96,000 people used Fort Richardson in 2001 as a recreational destination (p. 3-138). The average annual recreational use was 6,683 from 1996-2001 on Fort Wainwright, Donnelly Training Area, and Eielson lands (p. 3-133). The Department does not understand why general recreational use information is not available to the authors of the EIS since a primary reason for establishing recreational permit fees to access Fort Richardson lands was to monitor and quantify recreational uses. Moose hunters alone pay \$125 for this privilege. We suggest that the Army reexamine recreational permit records to determine use levels.

Public Access and Recreation 01

Per the Sikes Act, USARAK has primary authority to determine appropriate public use and fees on its lands. Records of public access and use on Fort Richardson have not been maintained or preserved beyond one year. An automated phone call-in system, USARTRAK, is expected to assist in future records maintenance.

Socioeconomics 11

Text has been modified to address this comment. Please see Section 3.13, Socioeconomics.

Public Access and Recreation 02

Analysis indicates that Fort Richardson would still be available to public access for a majority of the year. For a description of public access impact analysis methodology, please see Section 4.14, Public Access and Recreation.

Table 3.13:p should not include average annual users for sheep hunting. Sheep hunting is not permitted on Fort Richardson.

“Restricting access on these lands due to changing training needs may significantly reduce the amount of game available to harvest.” (p. 3-134)

This statement refers to the proportion of moose harvested on Army lands in interior Alaska (21% of all moose harvested, on average). Over 40% of the state’s population resides in Anchorage and permit hunts on Fort Richardson are one of the few opportunities to hunt moose near home for these residents. Success rates are high, and the draft EIS should acknowledge that 44% of the moose harvested in Game Management Unit 14C from 1996/97 to 2000/01 were taken on Fort Richardson. Loss of this hunting opportunity on Fort Richardson will be a severe impact to local resident hunters, including soldiers from Fort Richardson, who are allowed to hunt moose on post without purchasing a nonresident hunting license or moose tag, or paying the post access fee.

Page. 3-138 states: “A hunting, trapping, and fishing permit is required for everyone over 16 before hunting on Army lands...On Fort Wainwright and Donnelly Training Area, these permits are free. There is a \$5 cost associated with permits on Fort Richardson.”

This statement should be corrected to recognize that in recent years, Fort Richardson moose hunters have been charged \$125 for these permits. Although moose hunters are one of the smallest recreational user groups on military lands, those that hunt on Fort Richardson are assuming a large proportion of costs of the recreational use program statewide.

Public Access and Recreation

Public access and recreation will be adversely affected by the proposed activities. The relatively large Alpha, Blair Lakes, AFTAC and Stuart Creek Impact Areas are already off-limits to the public, and two additional Zone 3 areas (Figure 3.14.a) are being considered for closure. The anticipated increase in training levels and the projected closure of additional lands will further reduce public access. The Tanana Flats is a popular area for moose hunting and trapping. Moose populations in Unit 20A are managed for high levels of human consumptive use (Intensive Management designation by the Alaska Board of Game). Reductions in moose populations and/or harvest opportunities could have regulatory and other consequences. The Department suggests that the Army maintain public access to this popular hunting area, at least seasonally to allow public participation in hunting activities.

Page 4-138, 4-139 states “All types of public access are expected to continue unabated under [Alternative 3]...Hiking and access to southern Fort Richardson is expected to continue.”

“No additional impacts are expected to other forms of recreation, such as fishing or hiking.”

These statements do not represent future access opportunities to the areas, particularly Fort Richardson, if the perimeter fence is constructed. The Department requests that the Army provide information to the Department and the public regarding how public access of all types will be maintained.

Current training conditions and levels severely restrict access to moose hunters in areas they are allowed to hunt under permit. The increased training and security requirements described in the draft EIS are likely to have a greater impact on hunting and other types of outdoor recreation on all military lands. These impacts should be acknowledged and examined in more detail in the draft EIS and efforts made by the Army to provide for continued recreational access.

Air Space

Increased airspace restrictions resulting from closures for training activities would further hamper Department survey and research activities. Department research and

Public Access and Recreation 03

The \$125 moose permit fee is applied to wildlife conservation programs. Text has been modified to address this comment. Please see Section 3.14, Public Access and Recreation.

Public Access and Recreation 04

Thank you for your comment.

Public Access and Recreation 05

Please refer to Sections 3.14 and 4.14, Public Access and Recreation, as well as the INRMPs for each installation.

management staff find it difficult with the large areas of restricted airspace already in place (i.e., R2211, R2202 and R2205, which are restricted M-F from 8-5), to complete their responsibilities in an efficient manner. Potential increases in air space restrictions would likely make that work even more difficult to conduct and may make some projects nearly impossible to complete. The Department recommends that the Army meet cooperatively with area and regional staff to develop guidelines that will allow the continued use of air space at current levels.

Fuels Management

“There is some concern over the spruce bark beetle that killed most of the larger white spruce in the North and South Post training areas. The dead spruce has resulted in a high fuel load condition on the forest floor.” (p. 3-104)

This is the only mention of the high potential for wildfire in the Anchorage metropolitan area. The Municipality of Anchorage considers spruce killed by spruce bark beetles as a significant threat to public safety in east Anchorage and has spent millions of dollars on fuels management, equipment, agency coordination, and public information and education. Wildfire would also affect wildlife populations on and adjacent to Fort Richardson.

The draft EIS needs to more thoroughly address these concerns. For example, it states: (p. 3-103). *“Although wildfires are a concern at Fort Richardson, they are rarely a significant problem”*. Current fire danger and fuel loads indicate more attention should be addressed to this concern. For example, the executive summary and section on environmental consequences (4.1.1.4.4) are more forthright:

“Training can cause fires through the use of incendiary devices, field burning, vehicle use, trash burning, and warming fires in bivouac areas. Factors relating to fire risk analyzed in this EIS include rounds of ammunition fired and training days. Fire risk . . . would increase from minor to moderate at . . . [Fort Richardson].” (pp. ES-6 and ES-7)

Most fires started on the mountain slopes behind the small range complex are from tracer rounds and pyrotechnics and this area has a high potential for wildfire (USARAK 1998). The section on environmental consequences indicates substantial increases in the number of rounds fired under Alternative 3 (70% increase in small arms rounds, 65% increase in high explosive rounds) and Alternative 4 (165% increase in small arms and high explosive rounds). Training days would also increase under Alternative 3 (15% increase in small arms range user days) and Alternative 4 (135% increase in small arms range user days, 7% increase in major weapons range user

Airspace and UAV 01

Current USARAK procedures for training closures will continue to be followed under SBCT transformation. Requests for scheduled public access would continue to follow the same guidelines that are currently in place.

Fire Management 03

The purpose of Chapter 3 is to succinctly describe the environment of the area to be affected by the alternatives under consideration, while the purpose of Chapter 4 is to discuss environmental impacts of the alternatives.

days). Increased training due to presence of the Strykers or other vehicles will also increase in the short-term under Alternative 3 and increase by 270% (from 14,610 to 39,478 km² days) under Alternative 4. These appear to be more than moderate increases in fire risk, and even moderate fire risk may be more than the state's largest urban area can handle. Recent fire events, such as the Millers Reach fire, have shown that it is not unusual for a wildfire to overwhelm suppression efforts under the right conditions.

The community of Delta Junction filed a federal lawsuit against the USARAK for failing to adequately address in the draft EIS the high fire danger that could result from Stryker maneuvers about three miles downwind of Delta Junction (Associated Press 2003). The increased fire risk to public safety and destruction of property is much higher in Anchorage because of denser construction and population numbers.

We strongly suggest that the Army reevaluate the risk of fire from increased training levels and cooperate with local state and municipal agencies in development of fire suppression plans and evacuation routes.

The Department suggests that the Army should meet cooperatively with state and federal agencies to review fire management plans developed for state and federal lands adjacent to military properties. Fire management options may then be modified or changed (i.e., increased fire protection/suppression) to protect facilities and/or activities, or to be allowed to burn based on current classification.

A cooperative review of the management plans may also provide an opportunity for rehabilitation of over-utilized browse stands in moose habitat areas near Army lands. For example, the Unit 20A moose population is already exhibiting signs of nutritional stress (low productivity) and studies have documented range over-utilization. Potential measures to reduce wildfires or prescribed burns would exacerbate the problem. Fires allowed to burn under developed guidelines in identified areas could rejuvenate browse vegetation.

Noise

The draft EIS provides some background information concerning noise effects on wildlife (p. 3-153); however, it does not comment on the environmental consequences of increased training activity or the shift to more and larger vehicles and weapons.

Projected increases in noise levels in Tanana Flats Training Area during the moose calving season (mid May - mid June) could result in reduced productivity and survival of moose calves. Waterfowl nestlings and adults, especially Trumpeter Swans, are sensitive to noise. Increased noise levels and periods could result in nest abandonment

Fire Management 04

Thank you for your comment.

Fire Management 05

Thank you for your comment.

or other mortality. The Department suggests that the Army identify areas of high waterfowl nesting densities, especially Trumpeter Swans, and develop seasonal use closures to reduce noise levels.

The total acreage under moderate or severe noise levels (exceeds 75 db and 40% or more of the human population would be annoyed) would increase from 15% to 27% at Fort Richardson (p. 4-159). The draft EIS concludes that this increased noise will have a minor impact (p. 4-162) and will not affect human residential or commercial uses (p. 4-159); however, there is no discussion of the environmental consequences on recreation or wildlife populations. Moderate and severe noise levels that impact 16,461 acres (p. 4-161) of wildlife habitat should likely be classified as more than minor. Some wild animals adapt to loud noises, particularly noises that are predictable in time and space. However, increased noise levels and unpredictable human activities associated with the noise (e.g., maneuvers) have also been shown to reduce breeding activity and population levels of some species (Clevenger et al. 2001, Delaney et al. 1999, Fernandez-Juricic and Telleria 2000, Forman et al. 2002, Grubb and King 1991, Henson and Grant 1991, Matthews 1982, Reijnen et al. 1997, Ward and Stehn 1989).

Table 3.16.a (p. 3-153) lists typical decibel levels for several weapons. Fort Richardson currently uses 60mm and 81mm mortars and 105mm howitzers. Alternatives 3 and 4 will add 120mm mortars and replace the 105mm howitzers with 155mm howitzers (p. 4-159). Assuming the sound level of a medium howitzer (174 dBC) refers to the 105mm howitzer, the draft EIS should state the sound level of a 155mm howitzer and other larger weapons. The draft EIS should explain the increase in area and the impacts that will be generated by these louder weapons.

Mitigation

Proposed mitigation projects recommended for impacts to wildlife are inadequate. Proposals to “*Monitor effects of military training on select wildlife species*” and to “*Conduct a detailed study to assess the impacts of effects of noise*”, while laudable, are unnecessary. Similar studies have already been conducted in many areas of the country and for many species, including areas and species in Alaska.

The Department recommends that the Army conduct a detailed review of existing studies to determine mitigation actions for impacts already identified for sensitive species and seasonal uses resulting from training levels identified in the EIS. Information identified in this review would then be used to develop and implement management strategies and modifications in training schedules, locations, noise levels and other mitigative actions to address recognized impacts. For impacts not identified

Wildlife and Fisheries 23

A figure has been added that depicts trumpeter swan nesting surveys to address this comment. Please see Figure 3.9.c in Appendix A.

Wildlife and Fisheries 24

A review of disturbance impacts to wildlife was presented in Appendix F. In addition, because each species has different sensitivities and responses to noise, it is not possible to extrapolate information about human annoyance levels to wildlife. Contrary to the ADF&G statement below, relatively few published studies evaluating the effects of blast noise have been conducted on species of highest interest to ADF&G (i.e., species of economic value such as moose, caribou, and bison). The literature on the effects of blast noise on birds, especially raptors, is more complete. With the exception of the citation by Clevenger et al. 2001, all others related to the effect of disturbance on birds.

Noise 02

The increased noise levels are discussed in Section 4.16, Noise. See Appendix A, Figures 4.16.a, b, c, and d. Note that the impacts of blast noise, including artillery, are not well studied for many species, including most species of mammals. According to a review by Larkin (1996) “Military and civilian blast noise had no unusual effects on wildlife in most studies.”

Wildlife and Fisheries 25

Although there have been numerous studies on the impacts of noise (especially aircraft noise) to wildlife, relatively few studies have evaluated the effects of artillery on large mammals or waterfowl.

Wildlife and Fisheries 26

Please see Appendix F, Wildlife and Fisheries, which reviews studies of disturbance to wildlife species of interest in Alaska. The review includes citations of reports regarding wolverine, grizzly bear, wolf, caribou, moose, Dall sheep (and bighorn sheep), bison, beluga whale, sandhill crane, olive-sided flycatcher, sharp-tailed grouse, trumpeter swan, neotropical migratory birds, waterfowl and water birds, and raptors. Even though

in that review, but recognized as potential impacts to wildlife, the Department recommends the Army cooperate with state and federal management agencies in the development of studies to identify and mitigate additional impacts. The management strategies and mitigative actions then identified would be implemented prior to any activities by the Army.

The Department encourages the Army to incorporate full funding of environmental, biological, and physical plans and programs regardless of what Alternative is selected. This effort would support the Army's ability to increase knowledge of existing biological resources, human uses and their protection on federal lands.

Sincerely
Doug Vincent-Lang
Assistant Director
Division of Sport Fish

Cc

R. Sinnott
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this was not a comprehensive review, over 50 citations of scientific studies are listed. The USARAK Ecosystem Management team has evaluated the conservation status and knowledge gaps of wildlife species that inhabit lands used by the Army. As in the past, USARAK anticipates continued cooperative projects with ADF&G and other agencies to ensure conservation of wildlife and habitats (Appendix H). The INRMPS for each post also provide details of these projects.

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August 26, 2003

Received
SEP 9 2003

Certified Mail/Return Receipt Requested

Gale A. Skaugstad
Public Outreach Coordinator
Environmental Resources Department
Building 3023, Engineer Place
Fort Wainwright, Alaska 99703
Re: Comments on Draft Environmental Impact Statement Transformation of U.S.
Army Alaska
Our File No. 11025.014

Dear Ms. Skaugstad:

I represent the City of Delta Junction, Alaska ("the City"). Your Department was kind enough to provide me with a copy of the above-named draft environmental impact statement ("the Draft EIS"). The City of Delta Junction, Alaska has asked that I comment on its behalf. On behalf of the City, I thank you for that opportunity.

On July 1, 2003, USARAK issued an Environmental Assessment and Finding of No Significant Impact ("the EA and FONSI") for the Donnelly Range Expansion. The EA and FONSI failed to describe proposed levels of usage of the training facilities it described, and failed to address whether those training goals could be achieved consistent with the limitations on usage set out by USARAK in Appendix E to the EA and FONSI.

Just three (3) days later, USARAK issued the Draft EIS. The Draft EIS seems to imply, without ever clearly stating, that the transformation of USARAK may double or triple the demands on the new training facilities. The level of increased usage is never clearly described. How any level of increased usage will be accommodated is never described. Whether an expansion of the new ranges will be required is never discussed. How any expansion would be accommodated is never discussed. Whether USARAK will abide by the terms of Appendix E to the EA and FONSI is never discussed. These and related concerns are the focus of the City's comments:

1. Relation to Donnelly Training Range Expansion The Draft EIS assumes that the proposed Donnelly Training Range Expansion, as described in the EA and FONSI, will proceed as planned. As you may know, the City objected strongly to the location of those training facilities at the Eddy Drop Zone, and demonstrated the new ranges were better suited to the Donnelly Drop Zone. For your convenience, a copy of the City's letter dated March 6, 2003 is enclosed ("the Donnelly Range Expansion Comments"). The issues raised in that letter are now the subject of a pending appeal to U.S. District Court. A copy of the complaint is also enclosed. The Draft EIS should take into account the unresolved issues surrounding the Donnelly Range Expansion. The Draft EIS should discuss the effects of a possible location of the Battle Area Complex ("BAX") and the Combined Arms Collective Training Facility ("CACTF") at Donnelly Flats.

To the extent that the Draft EIS relies upon or presupposes the Donnelly Range Expansion at the Eddy Drop Zone, the City objects, adopts the Donnelly Range Expansion Comments by reference, and incorporates those arguments here.

2. Effects of Increased Activity The Draft EIS fails to provide sufficient detail on both the increased risk of wildfire and the mitigation efforts planned by USARAK. Those omissions make it impossible for the City to meaningfully evaluate those risks. For example, a forecast 50% increase in High Explosive Rounds Fired (Table 4.11a, page 4-106) on the Tanana Valley Flats carries a lesser wildfire risk than the same

Purpose and Need/Proposed Action 09

Thank you for your comment.

Donnelly Range EA 02

As agreed with the City of Delta Junction, the Army has withdrawn the Finding of No Significant Impact with respect to the proposed construction of a Battle Area Complex (BAX) and Combined Arms Collective Training Facility (CACTF) within the Eddy Drop Zone section of the Donnelly Training Area. The Army is committed to undertaking a review of the likely environmental consequences of constructing the BAX and CACTF range improvement projects. As part of that analysis, the Army will consider several alternative locations for the range improvement projects. The Eddy Drop Zone will be included among the alternative locations. Following this analysis and the choosing of a specific site for the BAX and CACTF projects, the Army may need to reconsider the conclusions reached in the Draft EIS with respect to cumulative impacts.

Fire Management 06

The Draft EIS provides substantial information with regard to increased training that will occur within federal land managed by U.S. Army Alaska for training. Included in the analysis is an assessment of the potential for a serious wildfire event occurring within the various training areas. What cannot be determined at this point

increase in areas adjoining the City of Delta Junction. The Draft EIS should address where the increased activity will occur in relation to the City of Delta Junction and the surrounding Delta community.

The same concerns identified by the City regarding the Donnelly Range Expansion Comments on the Donnelly Range Expansion apply here; wildfire, noise levels, and safety issues are particularly important. In the case of noise, for example, the maps should but do not show contours for noise levels in the range of 50-65 dB both as existing and as projected to allow the City to meaningfully evaluate the impact of the Draft EIS. As noted in the Donnelly Range Expansion Comments, the discussion should take into account the effects of aircraft overflights and winter temperature inversions.

3. Relation of Draft EIS to EA and FONSI As described in the City's Donnelly Range Expansion Comments and the enclosed Complaint, the City already regards the commitments made by USARAK in the EA and FONSI as seriously inadequate. To the extent that the Draft EIS proposes to modify those already inadequate commitments as to the proposed Donnelly Range Expansion, either by increasing the levels of activities or expanding the kinds of activities, then the City very strongly objects. The Draft EIS should explicitly address whether it modifies any position taken by USARAK in the EA and FONSI. To the extent that the Draft EIS purports to modify the terms of the EA and FONSI, including without limitation the limitations in Appendix E to the EA and FONSI, then the City demands those modifications be set out in an amended Draft EIS, with sufficient discussion and analysis to demonstrate that USARAK has fully and fairly considered the impacts of any such changes.

4. Placement of BAX and CACTF at Donnelly Flats As described in the City's Donnelly Range Expansion Comments, if the BAX and CACTF are constructed at Donnelly Flats Drop Zone and not at Eddy Drop Zone, then the City has no objections to the Draft EIS. However, so long as the BAX and CACTF are planned for the Eddy Drop Zone, because the Draft EIS contemplates increased activity and training, including training at the BAX and CACTF, and because those facilities are located too close to the City and developed areas, the City objects to the Draft EIS.

As the City has argued in the past, one of the chief drawbacks to USARAK of the proposed location for the BAX and CACTF is that the proposed location constrains those facilities' availability. Under Appendix E to the EA and FONSI, USARAK has agreed that in commonly occurring weather conditions in the Delta area, it will not use

is whether activities at the BAX and CACTF will increase the potential for a serious wildfire event. Such a determination cannot be reached until the Army completes an environmental review of the different potential locations for the BAX and CACTF. This review will include an analysis of wildfire potential.

Noise 03

The Draft EIS covers a variety of activities that have the potential to generate noise, as shown in the noise contour maps in Section 4.16, Noise. Within Donnelly Training Area, these activities include facility construction, vehicle traffic, weapons training and periodic aircraft overflights. Information provided in the EIS shows a small increase in the total acreage of Donnelly Training Area where noise levels will likely be at a moderate or severe magnitude. The analysis shows that the average day-night noise levels outside the training area should not exceed 65 dBA. As part of the environmental analysis of the planned range improvement projects, the Army will evaluate the noise potential for the BAX and CACTF based upon the different alternative locations being considered. Once this review is complete, it is likely that the Army will need to re-examine the Draft EIS cumulative impact analysis to determine whether the conclusions reached with respect to noise impacts are affected by the BAX and CACTF projects.

Donnelly Range EA 03

The analysis provided in the Draft EIS indicates that the Army will construct the BAX and CACTF within the Donnelly Training Area. Within the Donnelly Training Area are several potential sites where the range expansion projects (BAX and CACTF) could be located. The Army will undertake a comprehensive review of the potential environmental impacts associated with locating these projects at several alternative locations within the Donnelly Training Area. This analysis will comply with the National Environmental Policy Act and applicable Army regulations.

Donnelly Range EA 04

U.S. Army Alaska has not decided on a location for the intended BAX and CACTF range expansion projects. It will be considering several potential locations within lands in Alaska managed by the Army. The actual location for these projects will be decided after considering operational requirements and potential environmental consequences.

the BAX or CACTF. The Draft EIS does not analyze whether, within those constraints, those facilities will even be available for the increased training activities contemplated by the Draft EIS. The omission of such an analysis is fatal to the Draft EIS.

The failure to analyze the extent of those constraints is a major failure of the EA and FONSI. To the extent the Draft EIS presupposes the construction of the SAX and CACTF at Eddy Drop Zone, the Draft EIS makes the same mistake. To the extent the Draft EIS implies increased training exercises at the BAX and CACTF, it magnifies those defects. The Draft EIS fails to discuss these issues at all.

Again, the City points out these issues need not arise if USARAK relocates the BAX and CACTF to the Donnelly Drop Zone. If the BAX and CACTF were located at the Donnelly Drop Zone, then the City would have no objections to the Draft EIS. If you have questions regarding the City's position, please contact me.

Sincerely yours,
GUESS & RUDD P.C.
J.D. DeWitt
JDD/bkh

Enclosures: Donnelly Range Expansion Comments Letter dated March 6, 2003
Complaint
cc: Mayor Roy Gilbertson
City of Delta Junction

NOTE: The enclosures submitted with this letter are presented in Appendix I.

1. The comments in this letter are limited to the changes proposed to the Donnelly Training Range. The City makes no comments as to the proposed changes to the Fort Richardson or Fort Wainwright Training Areas. The City will address in a separate letter issues involving increase in highway convoy traffic attendant to the Transformation EIS, as summarized by the City Administrator at the public hearing Delta Junction earlier this month.
2. This issue and others are on appeal to the United States District Court for the District of Alaska. Nothing in this letter is an admission by the City that the limitations described in the EA and FONSI are adequate to protect the City or adjoining developed areas.

September 9, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV
1060 Gaffney Road, #6500
Fort Wainwright, AK 99730-6500

To Whom It May Concern:

On behalf of the Greater Fairbanks Chamber of Commerce, I would like to offer our official support for the proposed transformation of the 172nd Infantry Brigade (Separate) from a Legacy Force to a Stryker Brigade Combat Team (SBCT).

Alternatives 03
Thank you for your comment.

Fairbanks has a long history of supporting our men and women in uniform. We are proud to have the Army as our neighbor and we strive to maintain good relationships throughout Fort Wainwright.

As the nation's Army looks to transform itself to better meet our country's needs, Fairbanks is poised and ready to offer support for whatever alternative is adopted through the Environmental Impact Statement process that safely transforms the 172nd SIB to the 3rd SBCT. We understand there are many factors that are looked at in this process, but we recognize the need for transformation and look forward to witness the development of the 3rd SBCT in Fairbanks.

Again, we fully support the Stryker Brigade Combat Team to be in Alaska. If you have any questions or comments, please feel free to call me at 907-452-1105.

Sincerely,

Kara Moriarty
President/CEO

TANANA CHIEFS CONFERENCE, INC.

122 FIRST AVENUE, SUITE 600
FAIRBANKS, ALASKA 99701-4897
PHONE 907/452-8251 • FAX 907/459-3850

Mr. Kevin Gardner, Directorate of Public
Works, 730 Quartermaster Road,
Attention: APVR-RPW-EV (Gardner), Fort
Richardson, AK 99505-6500;

**RE: Written Comment on the Draft Environmental Impact Statement (DEIS) on
the Transformation of the 172nd Infantry Brigade (Separate) to a Stryker Brigade
Combat Team (SBCT) at U.S. Army Alaska**

Since its purchase from Russia in 1867, Alaska has had a longstanding history as a military outpost for the United States and more recently has become a global war-game training zone (i.e. Cope Thunder; Northern Edge). US military forces have used Alaska's unique strategic position, arctic conditions and vast training facilities (2.3 million acres, Department of Defense) to conduct joint and combined training events for themselves and their worldwide allies. Although Alaska's landmass per se is enormous, it is prudent however, to remember that people's land-use is mostly restricted to coastal areas and areas within the major river watersheds and their tributaries. Many active military installations, training areas, and formerly used defense sites are adjacent to present day Alaskan Native villages and traditional subsistence use areas. The subsistence economy is widespread among all Alaskans and constitutes the lifeblood for the majority of bush villages. Thus the village communities will feel adverse impacts on natural resources foremost. The combination of subsistence reliance and vicinity of subsistence users and their natural resources to active military installations and formerly used defense sites (FUDS) may place unduly socio-economic strains on Alaskan Native communities in comparison to the general Alaskan population.

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Recent global political developments have again focused the military limelight on Alaska and its land and air maneuver space. The United States Army has proposed to transform its current Legacy force to the Objective force within the next 30 years. As part of this action the US Army Alaska has proposed the transformation of the 172nd Infantry Brigade (Separate) to a Stryker Brigade Combat Team (SBCT) at U.S. Army Alaska. Begin of the transformation pending the DEIS is 2003 with the final goal of a trained and ready Alaska SBCT deployable for operations from the time of its initial operating capability (IOC) in summer, 2005. The SBCT transformation actions necessary to reach readiness requirements result in increases in uniformed/support personnel (7,912 soldiers vs. 6,577 soldiers, USARAK total), systems acquisition (i.e. Stryker, a 19 ton 8 wheel combat vehicle; n=322), maneuver space (138,300 miles per year versus 67,092 miles per year) and maneuver impact miles (161, 300 miles per year versus 31,600 miles per year). The substantial increase in maneuver space and maneuver impact miles reflects the significant increase in the intensity and frequency of deployment (24 per year versus 4 per year). Directly associated with the increased deployment is the tremendous increase in yearly military live fire training (17.2 million rounds per year versus 9.4 million rounds per year).

The Interior Alaska is characterized by a variety of ecosystems very sensitive to human disturbance and climatic change. It is without question, that immediate temporary to long-term persistent impacts to Alaska's natural resources and people are associated with all the activities (i.e. construction, stationing, training, deployment and systems acquisition) surrounding the Army force SBCT transformation in Alaska. The projected impacts, to land and subsistence resources and, therefore, people, in the Interior are potentially severe. Impacts of particular social and environmental concerns to us are:

- o Further reduction of public access to military lands due to training
- o Increased competition for natural resources and social services due the larger military force and their dependents in Fairbanks and Delta

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- o Cross-cultural conflicts
- o Increased road traffic between training areas (Fort Wainwright to Donnelly-Training Area; Fort Richardson to Donnelly-Training Area)
- o Increased moose x car accidents between training areas and military posts
- o Extended noise disturbance of people by military training activities
- o Extended disturbance of fish and wildlife due to training exercises (i.e. aircraft over-flight, armored vehicle training, artillery firing)
- o Vegetation and soil disturbance with subsequent degradation (erosion and extensive thermokarst pitting; increased wind erosion and runoff) on military lands due to off road Stryker vehicle traffic and soldier foot traffic
- o Increased wildfire frequency;
- o Habitat loss and fragmentation of important big game, waterfowl, and fish habitat due to construction and training activities
- o Disturbance of wildlife due to construction and training activities
- o Contamination of soil, wetlands, and watersheds with high explosive residues (i.e. TNT; RDX) and possible others: heavy metals, depleted uranium, chemical obscitants, and aluminized glass chaff
- o Seasonal run-off and subsequent pollution of waterways and spawning ground;
- o Subsistence food safety issues due to bio-availability and bio-magnification of contaminants
- o Future climate change interactions

The lack of appropriate field studies in the Draft EIS 2003 however, makes it impossible to realistically assess the magnitude of these environmental concerns for the diverse ecosystems of the Interior Alaska. In particular, the draft EIS report does not provide detailed information and analysis of future scenarios. Many controversial aspects as listed above are simply glossed over and not dealt with in an analytical manner allowing for a

Other 05

The topics identified are discussed in the following sections:

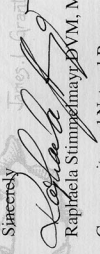
- 3.4 and 4.4, Soil Resources
- 3.5 and 4.5, Surface Water
- 3.7 and 4.7, Wetlands
- 3.8 and 4.8, Vegetation
- 3.9 and 4.9, Wildlife and Fisheries
- 3.11 and 4.11, Fire Management
- 3.12 and 4.12, Cultural Resources
- 3.13 and 4.13, Socioeconomics
- 3.14 and 4.14, Public Access and Recreation
- 3.15 and 4.15, Subsistence
- 3.16 and 4.16, Noise
- 3.17 and 4.17, Human Health and Safety

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basic understanding of the impacts. The general assessment of environmental impacts is often speculative in nature and only rarely based on field research data. The lack of appropriate field data for military training activities is a major problem and casts serious doubt on the validity of the presented overall environmental impact assessment. The current draft EIS can only be characterized as being extremely vague on environmental risk issues.

In conclusion, without additional analysis based on scientific principles and traditional ecological knowledge, the conclusions in the draft EIS regarding environmental consequences are dubious, at least. Committed long-term field studies and focused environmental research are needed to formulate basic risk assessments for the present and to develop future mitigation plans to address the environmental impacts associated with the "NEW" Alaskan Military Legacy. Lastly, it is very important for all concerned stakeholder parties to once and for all acknowledge that Alaska's ecosystems are extremely sensitive to human disturbance, development, and climatic change. Only with the help of more realistic environmental risk assessments and mitigation plans can Alaska's people and the US military forces together prepare environmentally sensitive responses to the proposed SBCT army transformation. Tanana Chiefs conference would be willing to work together with USARAK in the assessment, planning, and identification of measures to mitigate the possible adverse impacts that we have identified.

Sincerely,

Raphaela Stumpe, BVM, MS, PhD
Community and Natural Resources,
Tanana Chiefs Conference

Other 06

Impact analysis methodology is included at the beginning of each resource section. Quantitative analysis is performed according to availability of data. Please see Chapter 5, List of Preparers and Contributors, for breadth of consultation and professional experience involved in impact assessment, and Chapter 6, Bibliography, for a list of scientific publications and documents cited throughout the EIS.

Other 07

Impact analysis methodology is included at the beginning of each resource section. Quantitative analysis is performed according to availability of data. Proposed mitigation measures include committed long-term studies. See Section 2.2.3.7, Description of Proposed Action and Alternatives, for a summary of mitigations and Appendix H for currently planned projects.

Frank H. Murkowski, Governor

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September 5, 2003

SEP 15 2003

Directorate of Public Works
APVR-WPW-EV (Gale Skaugstad)
1060 Gaffney Road #6500
Fairbanks, Alaska 99703-6500

Dear Ms. Skaugstad,

Thank you for the opportunity to comment on the Stryker Brigade Environmental Impact Statement (EIS). Upon reviewing the document, we have the following comments and concerns.

Traffic Safety & Highway Capacity

A major concern is traffic safety and diminished levels of service on our highways due to military convoys. The projected deployment of convoys moving under a 40-45 mph speed limit will cause congestion and delays on our highways where the posted speed limit is 55-65 mph. Some drivers may become impatient and take undue risks by passing convoy vehicles in unsafe areas. This can endanger both Army and civilian personnel and vehicles. The document should evaluate the actual impact to the highway Level of Service (LOS) and develop alternatives to deal with these impacts. The mitigation measures contained in the EIS are very limited.

The suggested mitigation of breaking convoys into 20 vehicle units with a 30 minute separation between them seems unrealistic. The document should address measures to maintain convoy intervals in the event of mechanical failures, accidents or inclement weather.

The suggested mitigation of moving convoys during "off peak" hours may also have limited effectiveness. A significant portion of commercial truck traffic operates at night or in the late evening and early morning hours to avoid daytime traffic delays. This is an economic issue as well as a safety issue for commercial traffic.

Additional mitigation measures should be considered. This includes construction of passing lanes at regular intervals. Constructing alternate accesses to training areas should also be considered.

Highway Wear and Tear

The report projects up to 24 deployments per year totaling up to 500,000 or more annual deployment miles and vehicle weights in excess of 40,000 lbs. Potential highway damage resulting from this is not adequately addressed. DOT&PF highway designs are based on Equivalent Axle Loads (EALs). These EALs determine design life and potential wear and tear on the road surface, subgrade, and bridges.

Human Health and Safety 09

USARAK acknowledges differences in convoy and public speed limits. A Department of Army regulation (AR 55-2) stipulates maximum convoy speed and separation intervals.

Socioeconomics 12

Increased congestion has a social impact to both recreational and commercial drivers through increased time spent in traffic. This impact is considered minor and can be offset by public announcements of scheduled deployments. Any additional costs to distributors from increased travel time would be marginal.

Human Health and Safety 10

Thank you for your comment.

Human Health and Safety 11

Roadway degradation is not expected to significantly increase under any alternative. Equivalent Axle Loads (EALs) have been computed for the Strykers. These would add approximately 300-350 EALs per year to the Alaska highway system. This represents a fraction of a percent of current annual EALs.

EALs have not been computed for the remaining USARAK fleet. A feasibility study currently underway will evaluate costs associated with roadway degradation.

To address this, deployment miles should be translated into EALs on each highway route. Mitigation of increased reconstruction needs should then be quantified and addressed.

Aviation Impacts

Section 3.19.2.1.7, Air Space and Airfields (infrastructure), is the only section that specifically addresses the civilian aviation community. However, it only examines airfield improvements and does not evaluate civilian aviation use patterns and characteristics. Existing aviation patterns warrant evaluation within the EIS.

Increased use of airspace, en route to the many military MOAs in the region, may impact civilian aviation. We would suggest evaluating civilian aviation impacts in section 4.13, Socioeconomics, as well as in more detail in section 4.14, Public Access and Recreation.

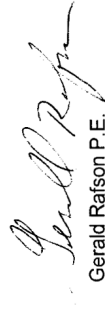
Note that the State of Alaska, not FAA, manages 266 airports throughout Alaska (including the Fairbanks International Airport). Other public airports in Alaska are managed by individual airport sponsors (communities, etc.) or the state or federal landowner.

Permitting

Convoys are subject to permitting by our Division of Measurements and Standards. This subject should be addressed in the EIS.

We appreciate the opportunity to provide comments on the EIS. If you have questions regarding the above comments or if you need general information on DOT&PF Operations please contact David Sanches, Area Planner at 451-2385.

Regards,



Gerald Rafson P.E.
Northern Region Planning Manager

cc: Andrew Niemiec P.E., Regional Director, Northern Region
Martin Ott, Chief, Planning & Administration, Northern Region
Jeff Ottesen, Acting Director of Statewide Planning
Sue Grandberg, Division of Measurements and Standards

Airspace and UAV 02

Minor impacts to USARAK airspace availability for civilian use are expected under SBCT transformation (4.14, Public Access and Recreation). This would be expected to lead to marginal increases in airspace traffic congestion, primarily affecting Merrill Field in Anchorage. Effects in the Fairbanks North Star Borough would likely be minimal. Analysis of impacts to civilian use of airspace is not possible because data on expected increases in USARAK airspace closures is not available.

Human Health and Safety 12

Current procedures require a convoy permitting process in consultation with the Alaska Department of Transportation. This requirement would remain the same under any alternative. Please see Section 3.17, Human Health and Safety.



City of Delta Junction

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Welcome to the Friendly Frontier

SEP 15 2003

September 5, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV (Gale Skaugstad)
1060 Gaffney Road #6500
Fort Wainwright, AK 99703-6500

To Whom It May Concern:

The City of Delta Junction wishes to comment on the Draft EIS and consult further with USARAK concerning proposed increased public highway traffic by military vehicles, particularly convoys.

The EIS currently considers traffic impact under the no action alternative as "minor" (Page 4-168) and under alternatives 3 & 4 "Overall convoy impacts are expected to be moderate." (Page 4-170). The increase from "minor" to "moderate" is of concern to the City of Delta Junction and we would request that a detailed written mitigation plan be developed for convoys to Donnelly Training Area (DTA) from both Fort Wainwright and Fort Richardson and be incorporated into the final EIS.

Delta Junction immediately adjoins DTA to the north, approximately 95 highway miles from Fort Wainwright and approximately 340 highway miles from Fort Richardson. The Richardson Highway is the ONLY road connection between DTA and Fort Wainwright and a portion of the ONLY reasonable road connection between Fairbanks and the continental United States (via the Alaska Highway which creates the "junction" in Delta Junction). The Richardson Highway thus serves not only Delta, but is a main public artery for freight, fuel, tourism, and general commerce from the lower 48 and Canada to Fairbanks. The great majority of the highway is two lanes.

The current convoy procedures (under the no action alternative) are not completely satisfactory to Delta residents and should be amended even if the no action alternative is chosen. The existing convoy problems could be greatly exacerbated under Alternatives 3 & 4.

A recent change in circumstances outside the military control is the increase in the speed limit from 55 to 65 mph. If the average convoy travels at 45 mph, it will be moving 20 miles per hour less than commercial traffic on a twisting two lane public highway. A convoy will significantly (and perhaps dangerously) impede the dual-trailer fuel tanker traffic between Canada and the refinery in North Pole, which travels at the speed limit.

Currently convoy traffic impedes all civilian traffic due to slow relative speed, convoys of excessive length making passing almost impossible; insufficient gap (time interval) between different convoys causing bunching together of separate convoys; and failure of convoy traffic to observe state statutes (rules of the road).

Convoys do not necessarily follow the state statutes regarding usage of public highways, going from mere discourtesy of pulling a convoy onto the highway in front of an individual motorist, to passing stopped school

Human Health and Safety 13

A Department of the Army regulation (AR 55-2) provides procedures for convoys. Additional mitigation for convoy traffic impacts has been proposed. Please see Appendix H and Sections 3.17 and 4.17, Human Health and Safety.

buses with flashing lights picking up or dropping off students. A recent state statute (AS 28.35.140) requires any vehicle holding up 5 or more following vehicles to pull over and let them pass.

Any convoy rules must require that state statutes be followed and that courtesy to the public be exhibited.

Convoys often contain too many slow moving vehicles to be safely passed by non-convoy vehicles.

Convoys often bunch up due to insufficient space between different convoys. This can be alleviated by requiring a greater time dispersion between convoys. 45 minutes would be suggested. On a 90 mile trip this can become critical.

Conveying at night or "off peak" times could be a real help. Also greatly appreciated would be advertising specific convoy times and dates ("southbound convoys on Wednesday between 8 am and noon") on the delta area radio station, in the *Delta Wind* newspaper, in the *Fairbanks Daily Newsminer* newspaper, the Glenallen newspaper, the *Copper Valley Weekly* (882-3927) and the *Valdez Vanguard* for convoys on the Richardson Highway.

In addition to modifying the current rules of conduct for convoys on public highways we:

- 1) Suggest the military support the Alaska Department of Transportation in expediting the construction of passing lanes between Delta Junction and Eielson as well as between Delta Junction and Glenallen;
- 2) Encourage the Alaska Department of Transportation to replace Jarvis Creek Bridge expeditiously; and
- 3) Wish to be prominent in supporting the need for the Railroad to be extended from Eielson AFB to Fort Greely.

The draft EIS does not allow for a full evaluation of convoy impact on the Delta area because vehicle miles shown do not break out the highway miles from air travel or rail. While we can assume that travel from Fort Wainwright will be predominantly by highway, highway travel to Delta from Fort Richardson is impossible to calculate from the information in the draft EIS. Also the Draft EIS does not give information about what times of year or size of convoys (one gigantic convoy a year, or many small convoys every month). For purposes of this comment, we will assume that convoy activity will be similar to existing practice, which appear to be mainly in the winter months.

In closing, we wish to make clear the City of Delta Junction is generally in agreement with the new role for the U.S. Army Alaska. We do not wish this statement to be construed as being against the new expanded roles of the army.

Respectfully submitted,


Roy Gilbertson, Mayor
City of Delta Junction

cc: Eugene Kane, DCED
Mike Burton, DOTPF

Human Health and Safety 14

A Department of the Army regulation (AR 55-2) stipulates separation intervals for convoys.

Human Health and Safety 15

Media notification of precise convoy dates has been added as a proposed mitigation measure. Thank you for your comment.

Human Health and Safety 16

Thank you for your comments.

Human Health and Safety 17

Tables have been included describing convoy routes, size, and frequency. Please see Section 4.17, Human Health and Safety.

ECO-088

02-017-DOD

Kevin Gardner
 Attention APVR-RPW-EV (Gardner)
 Directorate of Public Works
 730 Quartermaster Road
 Fort Richardson AK 99505-6500

Dear Mr. Gardner:

We have reviewed the draft Environmental Impact Statement (EIS) for the proposed Army Transformation of the 172nd Infantry Brigade (Separate) to a Stryker Brigade Combat Team (SBC^{CT}), at U. S. Army Alaska in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The draft EIS examines two action alternatives in detail. Alternative 3 would transform the 172nd Infantry Brigade into a Stryker Brigade Combat Team and add infrastructure. Alternative 4 would transform the 172nd Brigade, add infrastructure and an Airborne Task Force. With both alternatives there would be associated new construction, new training, systems and equipment acquisition, deployments and changes in land management. These activities would affect several training areas at Forts Wainwright and Richardson in the State of Alaska.

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

We are concerned about the apparent but difficult to quantify impacts, including cumulative impacts to natural resources resulting from large increases in live-fire training and maneuver training proposed in the Transformation. We are also concerned that the proposed mitigation, which emphasizes extensive monitoring, may provide less than adequate compensation for natural resource impacts.

Thank you for the opportunity to review this draft EIS. If you would like to discuss the content of this letter, please contact Jonathan Freedman at (206) 553-0266.

Sincerely,

Judith Leckrone Lee, Manager
 Geographic Implementation Unit

Enclosures

cc: Heather Dean, Marguerite Duffy

Page of

U.S. Environmental Protection Agency Detailed Comments on the Transformation of U.S. Army Alaska Draft Environmental Impact Statement (EIS)

Direct Impacts of the Proposed Action

The EIS provides generalized descriptions of potential impacts associated with activities occurring on Army lands in Alaska under the proposed action (Alternatives 2 - 4). Alternatives 3 and 4 in particular appear to cause significant impacts to soils, vegetation, water quality, wetlands, vegetation and habitat, ranging over very large areas on Forts Richardson and Wainwright. However, the EIS must quantify those descriptions in a manner so that reviewers and decisionmakers can predict the level of impacts to affected resources. This is an essential part of an EIS.

The EIS should more completely describe the spatial distribution of impacts to soils, waterways, vegetation, wetlands and other natural resources (and associated functions) where higher or lower intensities of impacts might occur or where they might affect the most critical resources. Resource impacts across alternatives are related in a qualitative sense by descriptors ("minor/moderate/severe") over an entire training area. These descriptors are not clearly defined or differentiated, (for example, Fisheries Resources are defined as Minor for every alternative and training area, for both wild fisheries and stocked fish) therefore of limited usefulness in comparing the effects across areas and alternatives.

When the EIS attempts to relate impacts in a quantitative sense, they are often described over an entire training area in Maneuver Impact Miles (MIMs). While reviewers can note that MIMs might increase as much as 500% over present conditions in some training areas, MIMs do not measure the area of resource impact or differentiate between the amount of new impact versus repeated impact on existing training areas where maneuvers and live fire exercise presently take place. The EIS measures the carrying capacities of Training Areas in MIMs but does not provide any information on how this carrying capacity was derived.

Some concluding statements of impact significance are not substantiated in the EIS. For example, the EIS states that long-term impact to soils will result from construction, increased weapons training, and increased training use of Stryker vehicles in maneuvers on all three project military reservations. The analysis acknowledges that

Environmental Consequences 01

Maneuver Impact Miles (MIMs) is a quantifiable index of spatial extent of damage to vegetation and soils. Impacts to habitat can be inferred from calculations on MIMs. Please see Section 4.4, Soil Resources, and Appendix F for additional information on how MIMs are calculated. Baseline water quality measurements are not available for many portions of the USARAK training areas; however, research by Houston (2002) and Palazzo et al. (2002) quantitatively describe munitions impacts to soils. These studies are cited throughout the text.

Other 08

The qualitative descriptors in several sections were largely based on quantitative data (e.g., Sections 4.2, Air Quality; 4.4, Soil Resources; 4.7, Wetlands; 4.13, Socioeconomics; and 4.16, Noise). Other sections used a combination of quantitative and qualitative information (e.g., Sections 4.8, Vegetation; 4.9, Wildlife and Fisheries; 4.11, Fire Management; and 4.17, Human Health and Safety). Rationale for qualitative impacts to fisheries resources were added to Table 4.9.d.

Maneuver Impacts 09

MIMs are a quantifiable index of spatial extent of damage to vegetation and soils. Please see Section 4.4, Soil Resources, and Appendix E for additional information on MIMs.

Maneuver Impacts 10

Additional information has been added to Appendix F.

while soil effects of Strykers are largely unknown, particularly in frozen soils since they have not been used in Alaska, even in relatively high strength soils, significant rutting can be expected. Soil rutting can lead to increases in erosion, changes in surface and sub-surface water storage and runoff, and habitat impacts. Additionally, the EIS is not clear how much of the previously disturbed or undisturbed soil might be affected or where soil damage might be expected to be concentrated or most severe. Since so much about the effects of Stryker vehicles is not known, there appears to be little basis or explanation for the conclusion that impacts are moderate, as opposed to minor or severe. There would appear to be a risk that this assessment may prove wrong in some training areas.

The EIS also makes statements, such as “bankside erosion would increase sediment in waterways (but) such erosion is not expected to have effects on channel morphology,” or “the rate of water flow on Alpha Impact Area and the rate of chemical degradation rate, bankside erosion impacts would be moderated and sedimentation would be minor” without offering any justification for the conclusions. Conclusions in the EIS should be supported or explained by data.

The EIS must be revised to quantify the location, intensity and percentage of impacts to the project area resource bases, and to more fully support the conclusions reached in the impact analysis Sections (most of Chapter 4). This would allow the public and the decision makers an understanding of the magnitude of the consequences of implementing the proposed action, measurable in a site-specific manner.

Mitigation

Proposed mitigation measures need to provide adequate compensation for the impacts of the proposed action. The proposed mitigation measures in the EIS consist in large part of assembling monitoring programs to gather needed baseline information on existing resources in the training areas to aid in future avoidance and minimization measures. While these are necessary, particularly in areas such as Fort Wainwright where basic data is lacking, monitoring programs do not provide any compensation for predicted impacts. For example, in the Soils Section, the proposed mitigation measures provide a good framework for development of monitoring procedures that will give the U.S. Army, Alaska valuable information to assist in the avoidance and minimization of future impacts. However, repairing soil damage, particularly in arid areas is very difficult, as the EIS acknowledges and if possible, can take a very long time to accomplish. Monitoring alone will not provide any compensation for predicted impacts.

In the surface water section, the EIS also proposes expanded monitoring to

Maneuver Impacts 11

Training with Strykers would occur wherever allowed, based on vehicle limitations (Appendix A, Figures 4.4.a, b, c) and environmental limitations (Appendix A, Figures 3.7.a, b, c). Please see discussions in Sections 4.4, Soil Resources, and 4.7, Wetlands.

Maneuver Impacts 12

Maneuver training would occur in areas where the soil strength is adequate (Figures 4.4.a, b, c) and where environmental limitations allow (Figures 3.7.a, b, c). Please see discussions in Sections 4.4, Soil Resources, and 4.7, Wetlands.

Environmental Consequences 02

Impacts would be expected to decrease the carrying capacity of training lands, not cause irreparable damage. The Integrated Training Area Management program and INRMPs detail numerous and specific project activities that restore, protect, and conserve natural resources (Appendix H).

gather water quality data for the many streams where current data is lacking, as well as modifying current practices to reduce munitions firing into surface waters. These measures might be very helpful in reducing future impacts but will not compensate for them. Establishment of vegetated buffers on waterways and rehabilitation of maneuver trails are good mitigation measures, which can assist in compensating for impacts if done on the appropriate scale. We suggest that the mitigation plan state how the widths were arrived at and how they would be enforced, monitored, and contingencies adopted if they didn't protect water quality. A plan should strongly consider constructing sedimentation ponds where maneuvers and live fire are done near major surface streams. More information is needed on how the Army plans to ensure compliance with water quality standards for runoff, erosion, control of sedimentation, and the kinds of water quality monitoring programs and control measures you will implement at each training area to ensure compliance with water quality standards and any applicable NPDES permits.

Some of the proposed mitigation measures would provide a level of compensation (see additional discussion below), but based on the information provided in the EIS, EPA concludes that fully adequate mitigation for irreparable impacts is best and most practically provided through preservation and restoration of lands outside the maneuver or impact areas. The EIS should commit to such a plan for acquisition and long term preservation or active restoration of lands outside the maneuver, live fire and cantonment areas. Such a plan could include lands outside or within present Army control, as long as preservation or restoration represents adequate compensation for impacts of the proposed action.

In the wetlands, fisheries and wildlife sections, we commend the U.S. Army, Alaska for proposing development of a comprehensive wetland data base to provide a resource baseline to aid in future impact avoidance. However, the mitigation measures proposed are too general for reviewers to evaluate how well they might compensate for impacts. The Army must make specific commitments in the Record of Decision (ROD) to development of a mitigation plan for wetlands, and implementation of natural resource conservation programs for fisheries and wildlife. The plan and programs should provide U.S. Army Alaska's resource managers with clear guidance describing the impacts that would require mitigation, when the thresholds for mitigation requiring action would be reached, mitigation designs for different kinds of expected impacts, appropriate locations for mitigation or natural resource projects, and a mitigation ratio framework to determine the size and design of specific mitigation projects. In phone conversation between my staff, you and members of your project team, you discussed the conditions of present Section 404 permits. These might serve as a starting point for a mitigation framework for aquatic resource impacts, and we strongly suggest you include them in the EIS and ROD.

Surface Water 03

Existing mitigation measures and procedures, and ongoing studies and monitoring projects are described in Appendix H.

Environmental Consequences 03

Seasonal as well as spatial limitations exist to protect wildlife and terrain. Specific training limitations to protect natural resources can be found in Appendix H.

Environmental Consequences 04

Many of these plans currently exist and are described in the INRMPs, but are currently not fully funded and implemented (Appendix H). In addition to developing new plans, USARAK proposes that these plans would be eligible for full funding and implementation.

Cumulative Impacts

EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, Consideration of *Cumulative Impacts in EPA Review of NEPA Documents*, which can be found on EPA's Office of Federal Activities home page at: www.epa.gov/Compliance/resources/policies/nepa/cumulative.pdf. The guidance states that in order to assess the adequacy of the cumulative impacts assessment, five key areas should be considered. EPA tries to assess whether the cumulative effects analysis: Page of

- Identifies resources if any, that are being cumulatively impacted;
- Determines the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and will occur;
- Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
- Describes a benchmark or baseline;
- Includes scientifically defensible threshold levels.

The cumulative impact analysis identifies the resources that may be cumulatively impacted and sets a detailed geographic framework. The analysis of impacts, however, appears too regional in focus. The emphasis should begin with resources on Army lands, (highly localized, semi-local and dispersed impacts) and differentiate more clearly between these scales and the regional scale. For example, your conclusion that surface waters are more impacted by community development in Fairbanks and Anchorage than the proposed action might be true regionally, but it does not appear to be a plausible conclusion for surface waters in Army training areas.

The analysis of future impacts in the EIS is careful to consider impacts that may appear later in time owing either to action by the Army or regional trends that may eventually affect resources under Army control. However, this Section needs to be more clear about what past impacts have been considered. Past impacts appear particularly critical in this analysis, as some resources on Army lands have suffered repeated past impacts which may greatly affect their ability to withstand the expected future increase in impacts from the proposed action together with affects from other sources. Without more information, it is difficult to establish a baseline against which future impacts can be measured. Finally, the Section should include a clear description of threshold levels, without which it is difficult to gauge the significance of cumulative impacts.

Jonathan Freedman (206) 553-0266
USEPA, Region 10

Cumulative Impacts 01

Text has been modified to address this comment. Please see Section 4.20, Cumulative Impacts.

Cumulative Impacts 02

Text has been modified to address this comment. Please see Section 4.20, Cumulative Impacts.

Cumulative Impacts 03

Text has been modified to address this comment. Please see Appendix F for a description of threshold levels for natural and cultural resources.

Geographic Implementation Unit
1200 Sixth Avenue, ECO - 088
Seattle WA 98101
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FAX: (206) 553-6984

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9.4.3 Public Meetings, Comments and Army Responses

U.S. ARMY GARRISON
TRANSFORMATION OF THE
U.S. ARMY ALASKA
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PUBLIC COMMENT MEETING
Held on Tuesday, August 12, 2003
Time: 12:00 noon to 8:00 p.m.
Meeting Proceedings Held at
LOUSSAC PUBLIC LIBRARY
Conference Room
Anchorage, Alaska

Reported by: Carol A. McCue, RMR
Heartland Court Reporters
Fairbanks, Alaska

P R O C E E D I N G S

(First presentation period,
no comments were recorded.)

* * * * *

(The following statement was
given at 1:50 p.m.)

THE REPORTER: Please state your name for the record.

MR. WILLIAM THEUER: William Theuer. I'm interested in the jointness of operations and what other units beyond the Stryker might train together. I'm interested in what other units might be training in the ranges that they are identifying. Thank you.

THE REPORTER: Thank you.

(End of recorded statement,
1:50 p.m.

Purpose and Need/Proposed Action 10

The SBCT would be expected to participate in future Joint Training Exercises that are similar to current operations. Please see Section 2.2.1.3.1, Description of Proposed Action and Alternatives.

* * * * *

(The following statement was given at 1:55 p.m.)

THE REPORTER: Please state your name for the record.

MR. DAVID ULMER: David Ulmer.

THE REPORTER: And what is your address?

MR. DAVID ULMER: 2221 Muldoon Road, Number 735.

THE REPORTER: Anchorage, Alaska.

Go ahead with your statement.

MR. DAVID ULMER: Very brief, I'm just against the Stryker Brigade coming in here. Fear for my safety.

Human Health and Safety 18

Existing USARAK and Army regulations, including AR 210-2, TC 25-8, AR 385-63, AR 385-64, and 350-2, govern safety measures in range design and range training use. In addition, ranges have been located east of Bulldog Trail and are oriented away from Bulldog Trail. USARAK maintains all training operations, including firing fans, within the boundaries of its lands.

Noise 04

Analysis of noise impacts is presented in Section 4.16, Noise.

And for my sleep at night, due to the noise of these guys shooting. They are trying to assure me that they will not be shooting my direction, but accidents happen. And they are shooting so close at the house that I'm afraid they are going to get turned around and bullets will come flying my way.

And operating at night, this is very loud in the area there because it's quiet at night, and the fact they are shooting with machine guns and windows are open, it's just going to be hard sleeping. And they don't care.

I guess that's it.

THE REPORTER: Thank you very much.

MR. DAVID ULMER: You're welcome.

(End of recorded statement,
2:00 p.m.)

* * * * *

(The following statement was
given at 2:07 p.m.)

THE REPORTER: Please state your name for the record.

MS. GRETCHEN DAY: Gretchen Day.

THE REPORTER: And your address.

MS. GRETCHEN DAY: 3201 Upland Drive, Anchorage, 99504.

THE REPORTER: And go ahead with your statement.

MS. GRETCHEN DAY: Okay. I am concerned about the Stryker transformation and all that it entails. I'm particularly concerned about the building of a 37 mile long fence. I've spoken with some of the people who are involved in the Environmental Impact Statement, and they said the fence idea was relatively new.

There has not been a lot of research put into the impact on wildlife. It's certainly going to gravely and negatively impact the human population that lives near it, but I also fear that it's going to decimate the wildlife population. Fences of this kind that have been built elsewhere in the world have over and over again shown that that occurs.

I'm very concerned about property values of the neighborhoods abutting the base where the fence is going to be put. These neighborhoods have struggled tremendously in the last few years to improve the quality of the community there, the Muldoon neighborhoods, and to -- to put this fence there, to increase the noise level, to have the transportation problems of running these Stryker Brigades through -- through the Muldoon end of Anchorage

Fort Richardson Fence 06

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

and then up to the Glenn Highway is just asking to degrade that neighborhood. And offering nothing in return.

In addition, I have a lot of concern about the increased risk of wildfires. The officers here have been telling us that they are going to increase live fire practice aiming towards the hillside so as to aim away from human populations, yet at the same time, they are -- they are aiming live fire at an area that's very susceptible to wildfire.

In their report, they say that the risks are moderate to severe, but they -- they shrug off the dangers by saying they are able to put out these fires. We've been living in fear for the last three years in south Anchorage of a wildfire of that nature happening. And here they are -- here the military is going to do it to us.

I think that there are many negative impacts from this project that are going to occur to Anchorage residents, particularly the Muldoon and the Hillside residents, and people have not been made adequately aware of them. I think the military needs to rethink how they can mitigate these impacts on the neighborhoods.

Thank you.

THE REPORTER: Thank you.

(End of recorded statement,
2:11 p.m.)

* * * * *

(The following statement was
given at 2:16 p.m.)

THE REPORTER: Please state your name for the record.

MS. CAROL WATERS: Carol Waters. W-A-T-E-R-S.

Fire Management 07

Analysis of impacts to fire management at Fort Richardson can be found in Section 4.11.4.4, Fire Management.

Fire Management 08

Thank you for your comment.

THE REPORTER: And your address.

MS. CAROL WATERS: 10300 Hillside Drive.

THE REPORTER: Go ahead with your statement.

MS. CAROL WATERS: All right. I came here today because I saw the article in the paper about the Stryker, as well as about the fence going up. And I have some questions about that, some concerns. And I really appreciate all the folks answering, but I want to make sure my comments are recorded today.

One concern has to do with noise levels. How noisy it will be. It is not -- I really couldn't tell from the diagrams how significant that noise level is.

And I would like some more information on noise levels and kind of reactions from people who have been in that area, either other examples of where this same kind of a fire, firing has gone on, and what the residents say about that.

This is going to be the first time this has ever happened. And I would like some testimony from other residents who have been witness to this.

They are talking the fire management impact statement that some of the impacts will be 165 percent. They don't tell us what the base is. So 165 percent of what? How many live fire days do we have now?

I expect that will be in the report and I'm going to read Chapter 2 as I've been asked to do. Since we didn't see it until just now, I will read Chapter 2.

I am very concerned about the possibility of live fire possibly hitting a residential area or an area where people are hiking or snow -- snowboarding or skiing. They say they have never heard anybody being hit, but they have never been shooting down there in that area before.

Noise 05

Significant noise levels are not expected off post (Zone II noise levels range from 65-75 dBA). Land uses such as industrial, manufacturing, and transportation are compatible within Zone II. However, residential areas, hospitals, and schools are not. Any noise-sensitive land uses are not compatible under Zone III levels (which exceed 75 dBA). For additional information, please see Sections 3.16 and 4.16, Noise.

Purpose and Need/Proposed Action 11

Approximately 65,000 high explosive rounds are currently expended each year at Fort Richardson under the No Action Alternative. Under Alternative 4, the number of high explosive rounds would increase to 174,000, which would be a 165% increase. All high explosive rounds at Fort Richardson are fired into the Eagle River Flats Impact Area. No increase in fire hazard is expected from high explosive firing into this impact area.

Human Health and Safety 19

Existing USARAK and Army regulations, including AR 210-2, TC 25-8, AR 385-63, AR 385-64, and 350-2, govern safety measures in range design and range training use. In addition, ranges have been located east of Bulldog Trail and are oriented away from Bulldog Trail. USARAK maintains all training operations, including firing fans, within

So I really -- I think that's a real concern that I have, live fire where I go cross-country skiing or where I go snowboarding, where I go skiing and hiking, in the summertime the hiking.

I did not hear that they have considered doing this same kind of live fire and Stryker preparation anywhere else or considering other places to do it. And I would like to know what other places they have considered.

One person said to me that we can only use land that's conceded to the military from the BLM. I don't know if they have ever consulted with the BLM and asked for other areas to be used for this kind of training. And that's a concern I have. I think they are using what's convenient.

Someone said to me, one of the folks who talked to me said this is the most convenient place to do this. Convenient for the military, but of course, it's not convenient for the residents of Anchorage.

We have been talking over and over again about we don't have enough land for residential and for hiking around Anchorage, and they are talking about building a huge bridge across Knik Arm. Well, it seems to me that we're using more military, we could take some of that military land and use it for more general purposes for our community.

I'm concerned about restricted land use. I think that restricting our use of land with a huge fence and restricting it because of live fire is a concern to me.

I think we should look to the military to be more innovative, instead of always going with what's most convenient, to look at what's -- what can we do further away from residential areas. I think we're looking for some concession to both the Hillside and the Muldoon area being used for live fire, to meet our personal needs.

the boundaries of its lands. An automated phone call-in system, USARTRAK, would provide easy means of determining areas closed to public access for training each day.

Purpose and Need/Proposed Action 12

The Army Programmatic Environmental Impact Statement identified locations for future SBCT stationing. The training ranges on USARAK lands would be utilized to their best ability to support the SBCT mission. Please see further discussion in Chapter 1, Purpose and Need for Action.

Fort Richardson Fence 07

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

A comment in here, if Senator Stevens lived in the Muldoon area, I don't think they would be doing it. He's way over on the other side of town. You don't see him sitting over there having a picnic right next to the Muldoon. So...

I think that's all.

THE REPORTER: Thank you.

(End of recorded statement,
2:22 p.m.)

* * * * *

(The following statement was
given at 2:37 p.m.)

THE REPORTER: Please state your name for the record.

MR. BILL WIELECHOWSKI: Bill Wielechowski.

THE REPORTER: And your address.

MR. BILL WIELECHOWSKI: 8603 Turf, T-U-R-F, Court,
Anchorage, Alaska.

THE REPORTER: And go ahead with your statement.

MR. BILL WIELECHOWSKI: I'm the president of the Northeast Community Council. I represent approximately 30,000 people that live in East Anchorage in the area that abuts Ft. Richardson, east of Muldoon.

The Northeast Community Council has serious concerns about the proposed fence along Ft. Richardson. According to the environmental assessment, it will detrimentally affect property values, it will detrimentally affect wildlife migration, and it will detrimentally affect the quality of lives of the people that live in that area by denying them continued access into Ft. Richardson that

Fort Richardson Fence 08

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

they have enjoyed for the past 20 plus years.

We would respectfully request that the federal government reconsider putting this fence in the area east of Muldoon. We request that the military have a formal EIS, Environmental Impact Statement, on this issue of the fence because this is a significant issue which will have significant impact on the community.

We've passed a resolution in the community council opposing the fence and requesting that the military meet with us. This resolution was passed 28 to 1. The military has not met with us. The assembly passed the resolution requesting that the military meet with us. That resolution was vetoed by the mayor. Nonetheless, the military has still not met with us to discuss this issue.

Additional comment, we also have concerns over the wildfire potential,

the noise,

and the potential for stray live fire into our densely populated community.

We support the military and we support the -- support the Stryker units in general. We support the military's effort to make our country more secure and to fight terrorism. We ask that you take our considerations into account.

Thank you.

THE REPORTER: Thank you.

(End of recorded statement,
2:41 p.m.)

* * * * *

Fire Management 09

Please see Sections 3.11 and 4.11, Fire Management.

Noise 06

Please see Sections 3.16 and 4.16, Noise.

Human Health and Safety 20

Existing USARAK and Army regulations, including AR 210-2, TC 25-8, AR 385-63, AR 385-64, and 350-2, govern safety measures in range design and range training use. In addition, ranges have been located east of Bulldog Trail and are oriented away from Bulldog Trail. USARAK maintains all training operations, including firing fans, within the boundaries of its lands.

(The following statement was given at 4:54 p.m.)

THE REPORTER: Please state your name.

MS. CATHERINE HEADY: Catherine Heady.

THE REPORTER: And what is your address?

MS. CATHERINE HEADY: 8611 Witherspoon Circle.

THE REPORTER: And go ahead with your statement.

MS. CATHERINE HEADY: Well, I would like to begin by saying I fully support the military and support Ft. Richardson, but I would really like the military to look at the funding that's proposed for the fence, the 5 million that was stated today, and apply that to expediting the infrastructure at Ft. Wainwright so that the money is better used. And there are other ways to address the security issues for Ft. Richardson, more effective ways.

So to me, they are tied together, these two issues. The Stryker Brigade and the fence. So that's plenty: Thank you.

THE REPORTER: Thank you.

(End of recorded statement, 4:55 p.m.)

* * * * *

(The following statement was given at 4:56 p.m.)

THE REPORTER: Please state your name for the record.

MR. RODNEY HUFFMAN: Rodney Huffman.

Fort Richardson Fence 09

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

THE REPORTER: And your address.

MR. RODNEY HUFFMAN: 6300 Rosehips Circle. Here in Anchorage.

THE REPORTER: And go ahead with your statement.

MR. RODNEY HUFFMAN: Under the housing and socioeconomics, they mainly concentrate on positive benefits, but the negative benefit is that there is not available lots to build the housing that they are speaking of having to build to accommodate the additional personnel in the local -- in the private sector. They are currently unavailable in Anchorage, yet they say it's an insignificant impact when there are just not that many lots left.

So I think they really need to address how they are going to accommodate the housing situation for the military personnel and their dependent families, whether they are going to do it on base, or if they are going to expect the private sector, which cannot absorb that, the new houses in the interim period before the 2010 time frame.

Other than that, I haven't had a chance to look at it.

THE REPORTER: Is that all of your statement?

MEMBER OF THE AUDIENCE: Yeah. I haven't really had a chance to look at it.

THE REPORTER: Well, send them an E-mail, then, when you're ready.

MEMBER OF THE AUDIENCE: I will.

(End of recorded statement,
4:57 p.m.)

* * * * *

Socioeconomics 13

In 2000, the housing vacancy rate for Anchorage was 6%. At most, only about 1% of increased demand would be added to the Anchorage market as a result of SBCT transformation. Socioeconomic analysis concluded that transformation would have a very small impact on the Anchorage housing market in the interim phase and no measurable impact at end state. For further discussion, please see Section 4.13.4.4.2, Socioeconomics.

(The following statement was given at 5:23 p.m.)

THE REPORTER: If you will state your name for the record.

SENATOR FRED DYSON: Fred Dyson with Eagle River.

THE REPORTER: And what's your address?

SENATOR FRED DYSON: 12239 Eugene Lane, L-U-G-E-N-E Lane, Eagle River. 99577.

THE REPORTER: And go ahead with your statement.

SENATOR FRED DYSON: Well, in lots of ways, Anchorage has had a marvelous relationship with military people here, certainly since World War II, and fully half of the citizens of the area came here in the military, either loved it or hated it. Most of the ones who hated it couldn't wait to get back, and many of the very best citizens here are retired military and have come back to make extraordinary contributions to the community.

And it's a symbiotic relationship that has worked very well. This city has mutual aid agreements on rescue operations, emergency response, like fire and police, and it's just been a marvelous kind of cooperation.

Also on medical service facilities, and the military families in my district, and district I represent have to include both bases and Eagle River, parts of Chugiak, parts of Mountain View, Government Hill, and Muldoon.

And there's a very high percentage of military families there. They tell me when I've been out knocking on doors that they have never lived in a community where they felt more welcomed and that the community was just very open to and very welcoming of military families.

The school district here operates the schools on the bases and a very symbiotic relationship. We work together on telephone, utilities, water, waste water, solid waste management. And this community is probably as much or more than any in North America really supports the military mission, families, and the servicemen. And with almost no problems.

And we -- part of what makes Alaska a very attractive place for our military is where it's at geographically in terms of the great circle routes, and we are -- how close we are to most of the population centers in the northern hemisphere, so that makes it a very strategic place in terms of advanced placement deployment of the military.

In addition, Alaska has this huge resource of lots of areas for a military training. It's what makes us attractive. And one of the things that makes us attractive, something that I personally am very committed to seeing that the access to training areas is preserved for the military.

And that's both true of Wainwright and here. There's just no other place in North America where the military has the training space and facilities.

And so we see that as a great asset for America's Department of Defense readiness and protection of our country and a great thing that we have to add to make us an attractive place for military to be trained and feel comfortable.

THE REPORTER: Is that it?

SENATOR FRED DYSON: Thank you.

(End of recorded statement,
5:28 p.m.)

* * * * *

Other 09

Thank you for your comments.

(Beginning of recorded statement,
6:24 p.m.)

THE REPORTER: Please state your name for the record.

MS. LAURA KRIP: My name is Laura Krip.

THE REPORTER: And your address?

MS. LAURA KRIP: 8603 Turf Court.

THE REPORTER: And go ahead with your statement.

MS. LAURA KRIP: Okay. Well, our backyard borders on the land that they are talking about building the fence in. And we own our home and we're certainly concerned that having a fence there is going to affect the property values of our home.

The other concern that I have is actually I'm a volunteer monitor for Chester Creek, which runs within -- it will be within the area they are talking about fencing, and I go out there and I test two times a month to test the health of the creek and the -- we also look at the wetlands around there to see -- monitor any changes.

Now, I'm really concerned about the water that's running through that area, and it -- where they are talking about building the fence is actually a wetland where we live. And when you study wetlands, it's a very fragile ecosystem. And I'm just worried about, you know, the impact of the building on an ecosystem that fragile.

And you know, we have the migratory birds that come through in the spring, and that's kind of exciting. And we have a lot of the birds that actually nest in the wetlands there. So I have concerns about the health of that ecosystem from building the fence, and also from, you know, from having that activity that close to the wetlands.

Fort Richardson Fence 10

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

And like I said before, my other concern is the health of the creek because the creek does run through that area, and we use that area as our testing site. And it's the south fork of Chester Creek that runs there, right maybe a few hundred yards from the houses back into the -- onto the military reservation land.

So I am not an advocate of this fence, and I wish there was at least a buffer zone between the area that the people live in and where they are talking about erecting this fence.

I mean, I know, I was talking in the Anchorage Waterways Council, which is who I work with, with the creek, and we were talking about if they are going to put a fence, I would hope that they would do it on an area that is already opened up, like the tank trail, which is not wetlands, it's back, what, a half mile from the houses, so it's kind of a safe distance.

And, you know, it's already an area that's heavily posted with signs saying that, you know, there are a lot of unexploded weapons and things back there, so I don't -- I don't think it's very trafficked by people as it is right now.

The area from our house and where we live, and there's the creek, and back to the tank trail is an area that is well trafficked by people in the community.

And so I wish that we could open up, you know, these lines of communication with the military and we can have a conversation. And I think a buffer zone is a nice -- would be a very nice compromise.

THE REPORTER: Is that your statement?

MS. LAURA KRIP: That's my statement.

THE REPORTER: Thank you very much.

MS. LAURA KRIP: Thank you.

(End of recorded statement,
6:27 p.m.)

* * * * *

(Beginning of recorded statement,
7:53 p.m.)

THE REPORTER: Please state your name for the record.

MR. JERRY WALTON: Jerry Walton.

THE REPORTER: And your address.

MR. JERRY WALTON: P.O. Box 221166. Anchorage, Alaska,
99522.

THE REPORTER: And go ahead with your statement.

MR. JERRY WALTON: I have a concern with the impacts
under all the alternatives to Ft. Wainwright, specifically
Ladd Field, national historic landmark.

The Draft Environmental Impact Statement indicates
there is severe impacts to that resource in Fairbanks, and
I would like to see everything done possible to minimize
or to avoid any impacts to those cultural resources.

End of statement.

THE REPORTER: Thank you very much.

(End of recorded statement,
7:54 p.m.)

* * * * *

Cultural Resources 03

The potential for severe impacts exists under each alternative, based on the nature of the landmark. Mitigation is in the Integrated Cultural Resources Management Plans (ICRMPs), and other independently detailed measures are in Section 4.12, Cultural Resources. Management of the National Historic Landmark is specifically addressed in the Historic Properties Component of the Fort Wainwright ICRMP.

(Beginning of recorded statement,
7:54 p.m.)

THE REPORTER: Please state your name for the record.

MS. CARLA FARGO: Carla Fargo.

THE REPORTER: And your address.

MS. CARLA FARGO: 8630 Witherspoon Circle.

THE REPORTER: Go ahead with your statement.

MS. DONNA FARGO: My statement, it will affect the property value, access.

MR. ALLEN FARGO: Loss of revenue to the city for loss of property revenues.

MS. CARLA FARGO: I mean. I'm trying to think what else wanted to add to that, as far as access.

MR. ALLEN FARGO: There's not going to be much access to the land. I'm just saying my own, my main concern is just loss of property value.

MS. CARLA FARGO: Because of the fence where it's at.

MR. ALLEN FARGO: Not being able, if you move the fence farther back, not having to have that right on the property line is our biggest concern. That's really my only concern about it. After this little presentation, that's the only thing I'm concerned about.

MS. CARLA FARGO: Okay.

THE REPORTER: Tell me your name, sir, I'll add your name to the statement.

MR. ALLEN FARGO: Allen Fargo.

Fort Richardson Fence 11

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

(End of recorded statements,
7:56 p.m.)

* * * * *

(Meeting proceedings adjourned
8:00 p.m., August 12, 2003.)

REPORTER'S CERTIFICATE

I, CAROL A. McCUE, RMR, hereby certify:

That I am a Registered Merit Reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing **Public Comment Meeting** proceedings held **August 12, 2003**, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true and correct record of said proceedings taken on the date and time indicated therein;

Further, that I am a disinterested person to said action.

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this _____ day of _____, 2003.

CAROL A. McCUE, RMR
Registered Merit Reporter
Heartland Court Reporters

My Commission Expires: February 15, 2006

U.S. ARMY GARRISON
TRANSFORMATION OF THE
U.S. ARMY ALASKA
DRAFT ENVIRONMENTAL IMPACT STATEMENT

PUBLIC COMMENT MEETING

Held on Wednesday, August 13, 2003
Time: 12:00 noon to 8:00 p.m.

Volume 1 of 1
Pages 1 through 7, inclusive

Meeting Proceedings Held at
CARLSON CENTER
Pioneer Conference Room
Fairbanks, Alaska

Reported by:

Laura J. Nunemann
Carol A. McCue, RMR
Heartland Court Reporters
Fairbanks, Alaska

P R O C E E D I N G S

* * * * *

(The following statement was
given at 2:14 p.m.)

THE REPORTER: Please state your name for the record.

MR. TODD BOYCE: Todd Boyce. I'm the Fairbanks North
Star Borough Transportation Planner.

THE REPORTER: And your statement.

MR. TODD BOYCE: Well, I had just some concerns, I guess, that I'd like to make the Army aware of regarding the potential increase in convoys, particularly heading down the Richardson Highway between Ft. Wainwright towards Greely between -- in between the training areas.

Currently, there is very few good passing areas on a lot of stretches of the road, and it might be real beneficial -- I see the typical speed proposed for these vehicles is 40 miles an hour.

I would like to see the Army work with DOT to consider some passing lanes on some of the -- in a couple of areas that perhaps the Army could help DOT out with funding. Something like that to allow vehicles to pass better.

Another concern is in the past, some of the -- at least one occasion that I saw on the Richardson there was a whole convoy of Army vehicles that were going into some kind of mission where they were all totally blacked out. All the headlights were covered over, taillights, everything, and this was in the dead of winter. It was pitch black out. And they were almost invisible.

I had a whole fleet of them scattered down the highway, and it was extremely dangerous. And I would hope that that would not be done in the future. That if vehicles are going to be on the roadway, that they do it at least in some way to try to make themselves visible, have lights if it's dark out. That kind of thing.

I believe I only saw that one time, but it was pretty -- pretty bad. I think that's probably my main initial concerns.

I already voiced one comment. I was wondering if any recreational areas would be closed as part of this to either recreation or hunting. That's a different issue apart from my job as transportation planner.

I think that's about it.

Human Health and Safety 21

Convoy procedures and safety measures are stipulated in Department of Army Regulation 55-2 (Appendix H). For further information on expected convoy frequency and mitigation, please see 4.17, Human Health and Safety.

Public Access and Recreation 06

Under Alternatives 3 and 4, frequency of closures for military training purposes are expected to increase, but there would be no increase in lands listed as off-limits to recreation. Per the Sikes Act, USARAK has primary authority to determine appropriate public use on its lands, secondary to the military mission. For more information on expected impacts to public use of USARAK lands, please see Section 4.14, Public Access and Recreation.

THE REPORTER: Thank you.

(End of recorded statement,
2:16 p.m.)

* * * * *

(The following statement was
given at 2:29 p.m.)

THE REPORTER: Please state your name for the record.

MR. GERALD RAFSON: My name is Gerald Rafson. I'm
Northern Region Planning Manager for the Alaska Department
of Transportation and Public Facilities.

THE REPORTER: And your statement or comment.

MR. GERALD RAFSON: I would like to thank you for the
presentation. And I have not completely reviewed the EIS,
but I would like to express concerns over traffic safety
due to the convoys.

I'm aware that the convoys are traveling at less than
highway speed and are being broken up into smaller units,
but that there is a tendency for these units to catch up
to each other and form longer bunches of vehicles.

I'd like to recommend consideration of construction
of passing lanes on highways to reduce the incidents of
unsafe passing as people become impatient.

And I'd also like to express some concern over the wear
and tear on our highways. I'm interested in whether an
evaluation has been done of the number of equivalent axle
loads that would be provided or that would be impacting
our roads due to the increased military traffic.

The equivalent axle loads are directly related to the
life of our facilities, the frequency of rebuilding. So
I'm very interested in seeing an evaluation of that.

Other 10

Thank you for your comment.

Human Health and Safety 22

Equivalent Axle Loads (EALs) have been computed for the Strykers. These would add
approximately 300-350 EALs per year to the Alaska highway system. This represents a
fraction of a percent of current annual EALs.

And with that, that's it.

THE REPORTER: Thank you.

MR. GERALD RAFSON: Thank you.

(End of recorded statement,
2:31 p.m.)

* * * * *

(The following statement was
given at 7:53 p.m.)

THE REPORTER: Please state your name for the record.

MR. RALPH MILLER: Ralph Miller.

THE REPORTER: And what's your address?

MR. RALPH MILLER: Post Office Box 70193, Fairbanks.

THE REPORTER: Okay. Go ahead with your statement.

MR. RALPH MILLER: Looking forward to the Stryker
Brigade coming in and I think it will be a great asset
to the community. I hope everything goes along with the
civilian military camaraderie the way it is at the current
time, and it appears that it's going to.

That's all I have to say. Thank you.

THE REPORTER: Thank you.

(End of recorded statement,
7:54 p.m.)

* * * * *

Other 11

Thank you for your comment.

(Meeting proceedings adjourned 8:00 p.m., August 13, 2003.)

REPORTER'S CERTIFICATE

I, CAROL A. McCUE, RMR, hereby certify:

That I am a Registered Merit Reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing **Public Comment Meeting** proceedings held **August 13, 2003**, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true and correct record of said proceedings taken on the date and time indicated therein;

Further, that I am a disinterested person to said action.

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this _____ day of _____, 2003.

CAROL A. McCUE, RMR
Registered Merit Reporter
Heartland Court Reporters

My Commission Expires: February 15, 2006

U.S. ARMY GARRISON
TRANSFORMATION OF THE
U.S. ARMY ALASKA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

PUBLIC COMMENT MEETING

Held on Thursday, August 14, 2003
Time: 12:00 noon to 8:00 p.m.

Volume 1 of 1
Pages 1 through 5, inclusive
Meeting Proceedings Held at

JARVIS OFFICE BUILDING
Delta Junction, Alaska

Reported by:

Carol A. McCue, RMR
Heartland Court Reporters
Fairbanks, Alaska

P R O C E E D I N G S

* * * * *

(The following statement was
given at 5:50 p.m.)

THE REPORTER: Please state your name for the record.

MR. AL EDGREN: My name is Al Edgren, I'm with the
Division of Forestry for the State of Alaska. Also in
charge of fire management for the Delta area for the state
and private lands.

THE REPORTER: Your address.

MR. AL EDGREN: P.O. Box 1149, Delta Junction, Alaska.
99737.

THE REPORTER: Go ahead with your statement.

MR. AL EDGREN: I'm speaking specifically in reference to the mitigation measures for Alternative 3 and 4 in the fire management section.

First off, there's already been some actions taken to mitigate fuels and put in a fire break and identify fire hazards, and I think you should reference those. I mean, you've already done a lot of work to deal with the fire issue and mitigating fire problems, but they are really not addressed very clearly here.

The -- some things I think I would try to add with your mitigation measures is I think you should work closely with the Bureau of Land Management and the State of Alaska to define initial attack resource needs during training periods, and they should be tied to fire weather indices.

And it talks about using the fire weather indices, but it doesn't talk about strength of force for initial attack or what manpower and equipment will be necessary for that strength of force for the initial attack of fighting fire. And I think that needs to be clearly identified and would not be that difficult to do.

With that would come a cost analysis for training at a particular fire danger level. An example is if you wanted to train on a moderate fire danger day and you knew you had to have six initial attack personnel and three fire engines, fire apparatus, there would be a cost associated with that. So a training exercise would know what that cost is going to be.

I guess I highly recommend you continue your fuels mitigation work. I think you're on the right track there, working closely with Dan Rees and Tammy DeFreis to identify those high risk areas and work -- continue to

Fire Management 10

Existing mitigation measures are clarified in Section 4.11, Fire Management. Thank you for your comment.

work on mitigating those issues.

I think also there needs to be something that defines the worst case scenario, how fire -- once a wild land fire starts that escapes initial attack, what occurs, what occurs in the community, what occurs on Ft. Greely, what occurs with the training facility and the training staff. All those things will be affected in a worst case scenario if a fire should escape. And I think that needs to be identified.

That's all I have.

THE REPORTER: Thank you very much.

(End of recorded statement, 5:54 p.m.)

* * * * *

(Meeting proceedings adjourned
8:00 p.m., August 14, 2003.)

REPORTER'S CERTIFICATE

I, CAROL A. MCCUE, RMR, hereby certify:

That I am a Registered Merit Reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing **Public Comment Meeting** proceedings held **August 14, 2003**, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true and correct record of said proceedings taken on the date and time indicated therein;

Further, that I am a disinterested person to said action.

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this ____ day of _____, 2003.

CAROL A. MCCUE, RMR
Registered Merit Reporter
Heartland Court Reporters

My Commission Expires: February 15, 2006

U.S. ARMY ALASKA TRANSFORMATION
DRAFT ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 28 July 03

COMMENTOR'S NAME: Leslie Lee McNeil

COMMENTOR'S ADDRESS: HC 60 Box 4840

Delta Junction, AK 99737

COMMENTOR REPRESENTING: Self ☒ Organization ☐

ORGANIZATION NAME: _____

ORGANIZATION ADDRESS: _____

PLEASE SEND ME A COPY OF THE FINAL EIS: Yes ☐ No ☒

PLEASE CHOOSE ONE: PAPER COPY ☐ CD ☐ EXECUTIVE SUMMARY REPORT ☐

COMMENTS: If the whole Environmental Impact Statement
is as screwed up as the Public and Agency
Shopping Report then there is very little reason
to believe or suspect that the data found therein
is anything but eye wash.

As an example the few errors after the
conclusion typed by the Court Reporter are flawed,

(over)

Comments Contd.

without repeating the "Statement Concerned" time is later than the "Statement Concerned" time.

I am sure that at least two statements given to the Court Reporter were left out as the two statements were made by me.

Was there a concern about the episode some statements because they covered subjects of an oral, not to address?

One of my statements covered the concern regarding the Delta that the ground water, which flows from the Great North Sea, is a well, might be contaminated, or diverted, by activities conducted above the water, floor.

This is a "Big" concern but I do not find it properly addressed in the Environmental Impact Statement.

I believe it is not true the number of people gave statements to the Court Reporter.

Jason F. Welch
1-907-895-5591

RETURN THIS COMMENT FORM TO:

Gale A. Skaugstad
Public Outreach Coordinator
Environmental Resources Department
Building 3023, Engineer Place
Fort Walawright, AK 99703

OR SUBMIT YOUR COMMENTS AND MAILING REQUESTS VIA E-MAIL OR THE INTERNET:

USARAK_EIS@cemml.colostate.edu
<http://www.cemml.colostate.edu/AlaskaEIS/comments.htm>

Other 12

There is no record of your attendance at the USARAK transformation public scoping meetings of February 2002. All comments were recorded by an independently-hired notary public. Records indicate you attended the Donnelly Range EA meeting of February 6, 2003.

Groundwater 16

Field studies conducted at Donnelly Training Area show that there is little to no risk of groundwater contamination from surface activities involving munitions constituents (Ferrick et al. 2001; Palazzo et al. 2002; Bristol 2003). USARAK continues to conduct ongoing surface water and groundwater sampling and monitoring programs.

U.S. ARMY ALASKA TRANSFORMATION
DRAFT ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 8/13/03

COMMENTOR'S NAME: MARICELA P. MORAN

COMMENTOR'S ADDRESS: 230 E. SURFIDE DR.
PORT HENRIE, CA 93041

COMMENTOR REPRESENTING: Self ☒ Organization ☐

ORGANIZATION NAME: CITY OF PORT HENRIE, COUNCIL MEMBER

ORGANIZATION ADDRESS: 250 N. VENTURA RD.
PORT HENRIE, CA 93041

PLEASE SEND ME A COPY OF THE FINAL EIS: Yes ☐ No ☒

PLEASE CHOOSE ONE:
PAPER COPY ☐ CD ☐ EXECUTIVE SUMMARY REPORT ☐

COMMENTS: As A US Citizen, taxpayer and elected
public official I am completely opposed to the
transformation of any Army unit/site to that of
a Stryker Battalion Combat Team (SBCT). The
historical and traditional trend to prioritize, through
immense political, financial, human and environmental
resources, primitive and violent means of conflict

Other 13
Thank you for your comment.

resolution is unjustifiable. While personal, social and physical defense is necessary to some extent, there is a serious lack of investment and prioritization of non-violent, more enlightened and truly intelligent and wise means of conflict prevention and resolution.

Marcia P. P. P.

RETURN THIS COMMENT FORM TO:

Gale A. Skaugstad
Public Outreach Coordinator
Environmental Resources Department
Building 3023, Engineer Place
Fort Wainwright, AK 99703

OR SUBMIT YOUR COMMENTS AND MAILING REQUESTS VIA E-MAIL OR THE INTERNET:

USARAK_EIS@cemml.colostate.edu
<http://www.cemml.colostate.edu/AlaskaEIS/comments.htm>

U.S. ARMY ALASKA TRANSFORMATION
DRAFT ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 8/12/02

COMMENTOR'S NAME: Terry Welter

COMMENTOR'S ADDRESS: P.O. Box 221168

Anchorage Alaska 99522

COMMENTOR REPRESENTING: Self ☒ Organization _____

ORGANIZATION NAME: Alaska Army Airfield Council

ORGANIZATION ADDRESS: P.O. Box 5549

Ft. Richardson, AK 99504

PLEASE SEND ME A COPY OF THE FINAL EIS: Yes ☒ No _____

PLEASE CHOOSE ONE: CD ☒ EXECUTIVE SUMMARY REPORT _____

COMMENTS: Terry Welter e-mail: omda.stetn.ak.us

Pg. ES-1 + Pg. TEL-27 thru 30 Acronym list EIS-719

"SIB" 172nd SIB. I assume it is "Stapler Infantry Brigade"?

Have spell it out

Other 14

SIB refers to Infantry Brigade (Separate). This has been added to our acronym list located after the Table of Contents.

Date: August 15, 2003
 Larry Kelly
 Delta Junction, AK

Comments: I support the relocation of the moc-city construction to a location that is down the Richardson Highway toward the Donnelly Flats or Black Rapids test areas. I the current location of choice can create future problems and dangers to the residents of Delta and the Alaska Highway area.

Thank you for the opportunity to participate in your evaluation.

Date: 13 August 2003
 Mike Lawrence
 North Pole, AK

Comments: In the Tanana Flats Training Area {TFTA} you show 2 new off limits areas and 1 new limited use area, are these areas totally off limits to hunters, sportsmen, snowmobilers etc?

For the entire year? Are NOT these areas unsuitable for STRYKER ops in the summer/fall?...why will they be off limits all year long?

Will there be UAV operations in the TFTA?

Do you realize that this area/airspace conflicts with published instrument approaches to Fairbanks International airport?

For all UAV operations whether at the Donnelly Training area, TFTA, or the Yukon training areas what is the concept of operation? What provisions are there for safety of flight relative to both civil and military aviation ie AF F16's and A-10s. [The TFTA for example, is outside of any published Military Operating Areas {MOA} or Restricted airspace].

Donnelly Range EA 05

The analysis provided in the Draft EIS indicates that the Army will construct the BAX and CACTF within the Donnelly Training Area. Within the Donnelly Training Area are several potential sites where the range expansion projects (BAX and CACTF) could be located. The Army will undertake a comprehensive review of the potential environmental impacts associated with locating these projects at several alternative locations within the Donnelly Training Area. This analysis will comply with the National Environmental Policy Act and applicable Army regulations.

Public Access and Recreation 07

These two areas indicate USARAK TFTA Recreational Impact Study Areas, which are off-limits to both military and non-military (Appendix A, Figure 3.14.a). Access is not allowed for the length of the study period. A description of USARAK use policy is provided in Section 3.14, Public Access and Recreation.

Airspace and UAV 03

USARAK has not requested a Certificate of Authorization (COA) for launch and recovery sites within/near R2211 (which is over TFTA). However, existing restricted airspace could be used for UAV operations as long as those operations follow existing restricted airspace procedures. Currently, R2211 is used extensively by the Air Force without conflict with approaching commercial/private air traffic to Fairbanks International Airport.

What system will be utilized for real time airspace activity advisory services, required to deconflict military and civil flying from UAV ops?

Will an advisory service even be provided? Such as the Special Use Airspace Information System [SUASIS] provided by the Air Force [as required by the FAA] for the MOAS and Restricted areas in eastern Alaska.

Will there be real time controllers available with the specific duties to advise the flying public of UAV flights on established UHF & VHF radios?

What altitudes will the UAVs operate at?

Will UAV flights be NOTAMed through the DODJCS/FAA Notice To Airmen System?

I understand a bridge across the Tanana river is planned. Will this bridge be open to the public?

Date: 13 Aug 03
Denise Saigh
Anchorage, AK

Comments: I walk, ski, jog, and bike on the roads behind the Muldoon homes. There are a short supply of lands left in Anch. to recreate on and the one advantage of living near a base is the space and land that as a Tax payer I am entitled to. Don't fence me out I am not a zoo animal. When there are army games there is always some one posted to inform us, why change now. There are hundreds of acres on the main bases to play.

Date: 13 August, 2003
Stan Smith
Chugiak, AK
Member of Chugiak Dog Musers

Airspace and UAV 04

Current airspace and airfield restrictions would remain in effect on all USARAK lands. Safety procedures established for existing restricted airspace will continue to apply to UAV operations. Please see Sections 3.19.1.1.7 and 4.19.4.2.2, Infrastructure. The UAV flies at a maximum altitude of 14,000 feet (Section 2.3.6.2, Description of Proposed Action and Alternatives).

Other 15

A multi-modal Tanana River crossing feasibility study has been initiated by USARAK through the University of Alaska, Fairbanks. Study results are expected by April 2004. A use policy will be developed upon completion of the study and selection of the type of crossing.

Fort Richardson Fence 12

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Comments: Dear Maam, or Sir;

First, I am not against the fencing of the Military Post Fort Richardson, in fact I support the separation of civilians from the military training areas.

My concern is for the area surrounding the Beach Lake area. An area that the Chugiak area long distance mushers have used since the 1950's.

I understand the concern for your training areas, for National Security, as my son is in the Army, and will soon be deployed to the middle east. I want him and all our service personnel trained to be much better than any enemy they may be called upon to face in combat.

At the same time, these trails near beach lake are essential to the training of local teams for long distance competition. Please have the Base Commander take a tour of this area with me, as I feel we can have both, a highly trained professional military, and the best dog teams on earth, sharing a small portion of Ft. Richardson.

Please look at the history of these trails, Joey Reddington trained Fort Rich's sponsored dog team back in the 60's. I am only one of many dozens of people that train on these trails. I have trained here for about 20 years, for both of my Iditarod finishes and names much more famous than me are known to have trained and raced over this same area. Names like Barron, Barve, Buser, Fiedler, Jonrowe, Mackey and Reddington are only a few of the famous mushers tied to running, racing and winning the Iditarod.

My own son and daughter have both trained for the Junior Iditarod on these trails, along with many dozens of other youth. My daughter is hoping to race in the 2005 Iditarod and access to this area is essential to her success, as we work full time and cannot just take off for Cantwell, or Glenallen all winter.

Fort Richardson Fence 13

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Please look at this area carefully, and allow us access for dog mushing only! We can size down the access areas so that only small vehicles, like a four wheeler and dog teams can use the existing trails, and place gates in areas that will restrict access to the base. Anyone accessing this trail system for any reason other than mushing should be punished severely.

This old vet would like to very sincerely thank you for taking the time to review my request.

Thank you,

Stan Smith, Regular Army, 1967-1970. Wounded in Action vet
R.V.N.
(907) 688-6048

Date: August 8 2003
Wayne Wilken
Anchorage , Ak

Comments: I support the Army's building of a fence along the Ft Richardson boundary. I also support the Army's use of it's land for whatever purpose it wants. Private property owners who bought property along the Army base boundary knew, or at least should have known they were buying land that bordered a U S Military Base.
Build the fence. Use the land.

Email received August 12, 2002:
Ed Klimowski
East End Anchorage Resident

I have a DSL line which would download quickly, but the file gets corrupted and hangs up. I went to the Anchorage meeting and picked up the Environmental impact statement books. I listened to the presentation and find the project unacceptable for the following reasons:

Fort Richardson Fence 14

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Fort Richardson Fence 15

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

1. The fence that is proposed is an eye sore (8 ft - chainlink fence with razor wire) and a hindrance to the migration of moose. The 4 ft rail fence would be a much solution, and no fence where access is prevented by private property.

2. I studied the maps in the Anchorage portion and found that there is no data on the migration of wildlife or a count of how many moose, grizzlies, black bears and deer are in the area. What would be the impact of this training area have on the wildlife. Will there be a study made? The mining and oil companies are mandated to do these types of studies before any development is started.

3. The economic effects to Anchorage is also not very good. The army points to the fact that hundreds of millions of dollars will be generated to Alaska's benefit, but this is not true the contracts are generated out of Washington DC and very rarely a local Contractor will be chosen and history has proven that. A good example is this Environmental study, why is Colorado State University doing this study. We have experts with the University of Alaska that are well qualified.

A question came up regarding the value of the dollars generated from military payroll and wouldn't have much affect on the Anchorage economy. A civilian military employee compared the average monthly salary of an Alaskan (\$3000) with the earning power of an average soldier (\$3500), this is a play with numbers, what should have been compared is the average earnings of an Anchorage employee and the military, I believe the numbers would be considerably different.

Who would pay for the increased cost of education at Ft Richardson with the increase in personnel. Anchorage property taxpayer?

Fort Richardson Fence 16

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Wildlife and Fisheries 27

Text has been modified to address this comment. Please see Sections 3.9 and 4.9, Wildlife and Fisheries. Moose and waterfowl distribution maps (Figures 3.9.g and h) were added to Appendix A.

Socioeconomics 14

The correct comparison was made in the text. Table 3.13.p shows average monthly earnings in Anchorage of \$3,037 vs. uniformed military monthly earnings of \$3,552. Figures were taken from the Alaska Department of Labor and Workforce Development (2001).

Socioeconomics 15

Federal Impact Aid for education is designed to offset the lack of local property taxes on federal properties within school districts. This aid would increase according to enrollment of on-post students. On Fort Richardson and Fort Wainwright, Federal Impact Aid more than offsets the lack of local property tax revenue from students living on post. Students living off post are on properties that contribute to the property

tax base just as other local residents do. Please see further discussion in Sections 3.13 and 4.13, Socioeconomics.

Human Health and Safety 23

USARAK has ongoing programs and procedures to clean up past contaminated sites (Formerly Used Defense Sites or 'FUDS') and to limit or prevent further environmental damage.

4. There were statements from the civilian military personnel that the military will immediately cleanup environmental damage made. When I asked about the cleanup of spent ammunitions casings, lead bullets and the phosphorus from tracer ammunitions, I received no answer. Waterfowl have been dieing from spent munitions at Fort Rich. for decades. Recently it was discovered that Agent Orange was buried by a military contractor in Alaska with direct orders from the military, abandoned radar site contaminated with PCBs, and hydrocarbons dot the countryside all over Alaska. To trust the Military to cleanup after themselves would be very difficult with their past history.

I understand the need of the training grounds, for this type of military organization but I question the location next to a major Urban area.

Date: August 6, 2003
Phillip C. Petrie
24532 Teal Loop
Chugiak, AK 99567
pcpetrie@mtaonline.net

Comments: I fully support the EIS draft EIS report and the transformation of the USA AK to the Stryker Brigade. I am a retired member of the USA and spent most of my career in Alaska. I believe that the plans you have for the locations and construction are appropriate and needed. The issue of placement of the training sites at Ft. Greely should be determined by the needs of the Army and not the community. The separation is adequate at Greely.

The issue of the location and erection of the fence at Ft. Richardson is a non-issue. The public has no claim to recreational uses of the land needed for the training

Purpose and Need/Proposed Action 13

The U.S. Army has a fixed amount of training lands and must utilize the training areas in the inventory.

Alternatives 04

Thank you for your comment.

sites. Build the fence and keep them off the Army training area. They are breaking Federal law by trespassing on government property needed for the training of soldiers. Ft. Richardson is co-located with Elmendorf AFB making it an ideal location for a Stryker Brigade and its rapid deployment to trouble spots. If anything the Army's presence at Ft. Richardson should be expanded to a full Brigade and the expansion of the Stryker capability to a full Division between Ft. Richardson and Ft. Wainwright. The military has the infrastructure here. The Army and Air Force have appropriate facilities and a major hospital also. Expand the placement immediately. Do not delay.

Date: August 6, 2003
 Phillip C. Petrie USA Ret CW4
 Chugiak, AK 99567

Comments: This is to supplement my previous comments concerning the SBCT stationing draft EIS. I fully support option 4 and encourage the Army adopt the EIS recommendation and proceed with the immediate construction and deployment. I also again encourage the Army to expand their plans from the SBCT to a Division stationing in the near future. The infrastructure, port and positioning make Alaska ideal to protect American interests in the Far East. Our current treat areas are Korea, China and the Mid-East all area that forces from Alaska can reach quickly and efficiently. Make no changes to the EIS and proceed.

Alternatives 05
 Thank you for your comment.

Email received Tuesday, July 08, 2003:
 Subject: DEIS for planned Stryker Brigade Combat Team, AK

Dear Mr. Gardner,

Yesterday in the Federal Register, a Notice of Availability of the DEIS for a planned Stryker Brigade was published with your name as a contact for any questions.

In the DEIS, is there mention of modifying/adding Special Use Airspace (such as Restricted Airspace or Military Operations Areas)? If there are any changes, what are they?

Unfortunately, I couldn't find any mention of airspace changes. I can only assume that there are not any planned, but I wanted to make sure.

Any help would be greatly appreciated.

Best Regards,

Brent Hart
Government Analyst
Air Traffic, Regulatory & Certification Policy
Aircraft Owners and Pilots Association (AOPA)
Tel: 301-695-2207 Email: Brent.Hart@aopa.org
www.aopa.org

Email received Wednesday, July 16, 2003:

Mr. Gardner:

I am particularly interested in the portions of the DEIS for the Stryker brigade implementation which involve the use of UAV's, specifically the use and operation of the Shadow UAV as part of the Stryker Brigade complex.

Please keep me informed of any meetings or movements on this subject.

Mike Vivion
Vice Chairman
Alaskan Aviation Safety Foundation

Dear Col. Snodgrass:

Thank you for forwarding the draft U.S. Army

Airspace and UAV 05

Due to increased training, closure of current restricted airspace would be expected to increase in frequency under Alternatives 3 and 4. No additional restricted airspace areas are proposed as part of SBCT transformation (Section 4.19, Infrastructure).

Airspace and UAV 06

This information is discussed in Sections 2.3.6.2, Description of Proposed Action and Alternatives, and 3.19.1.1.7, Infrastructure.

Transformation Environmental Impact Statement (EIS).

It is obvious that this document is a highly professional representation of the environmental aspects relating to the transformation program for the U.S. Army here in Alaska. The authors are to be congratulated on a job well done.

It appears that Alternative 4 would best meet the Army's needs and, if so, I fully endorse adoption of that approach. As a biologist, I see no adverse environmental impacts that would be of any significance with that approach. Please advise if the Army desires another approach for this project.

Please feel free to have your staff contact me if they have any questions or if I can be of assistance. I would appreciate receiving a copy of the final EIS.

Sincerely,

Robert O. Baker, Ph.D., Cdr. USN (ret.)
840 Breakwater Cir.
Anchorage, AK 99515

Date: 09/03/03
Kimberly Wells
Anchorage, AK 99507

Comments: This proposed fence will not serve its "purpose". It will only harm the wildlife, possibly people as well. It will harm peoples way of life. It will not keep anyone out who want in. The \$5million should be spent in a more sensible way, like signage, patrols, tv, radio, newspaper announcements when training will be taking place. The community will cooperate when training is in force and respect the area as we have done for many years now. Why can't anyone see that this is just plain stupid? We could spend time and money on more important problems to solve. Kimberly Wells

Other 16

Thank you for your comments.

Fort Richardson Fence 17

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Date: 25 Aug 03
Thomas C. Williams
Anchorage, AK

Comments: Considering the wetlands/marsh/bog that the fence will be built on, what will be the annual cost of maintenance?
How does the fence improve security for the training area? Wouldn't the Army be better served in putting the fence project money into base housing?
Will the US Army reimburse the property owners for the decreased value of their land?
Will the US Army reimburse the City of Anchorage for lost revenue?
What is the Army's plan for up keep on the fence to prevent it from becoming a safety concern?
Is this fence required or is it being used to further someone's career because it sounds good on paper?
Is this fence a fraud, waste and abuse complaint waiting to happen?
Why is the Army conducting live fire exercises in the most densely populated area of the city?

Date: 25 August 2003
Bill Brophy
Fairbanks, AK
Usibelli Coal Mine, Inc.

Comments: Dear Sirs:
I strongly recommend Alternative 4 - Transform 172 SIB, add new infrastructure and add the Airborne Task Force. This is the most profound development for US Army Alaska to maintain a warfighting capability for our nation's defense. Strategically, Alaska's location continues to be vitally important to the US military. Alaska is an excellent staging platform to deploy forces across the globe. Arctic soldiers are able to maximize use of the abundant training lands and air spaces to accommodate current and future weapons systems. Strongly recommend Alternative 4.

Fort Richardson Fence 18

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Other 17

The training ranges on USARAK lands would be utilized to their best ability to support the SBCT mission. Live-fire training at Davis Range does not include large caliber weapons or high explosive ammunition. Firing fans are designed to face away from public areas. Direction of fire is toward natural or constructed berms.

Alternatives 06

Thank you for your comments.

Most Respectfully,
Bill Brophy
Vice President, Customer Relations
Usibelli Coal Mine, Inc.

Date: 9/6/03
Catherine Heady
Anchorage, AK
Organization Name: Citizens for Sensible Land Use

Comments: This report does not address some vital issues that our important to the community on the east side of Anchorage. Since it states that there will be an increased risk fire danger due to the new activity, it does not present a wildfire management plan.

The report fails to address the construction of the military fence, which all the politicians and business people seem to think is required for the Stryker Brigade. Col. Bolz has stated publicly that the fence is not needed for the Stryker Brigade. This report and the Environmental Assessment for the military fence need to address cumulative impacts on the environment of both of these activities.

I want to see a plan for wildfire management, wildlife management based on sound science.

I would like to see a buffer for live fire next to our city, equivalent to that on the military base and its residential areas. I would like to see an evaluation of the proximity of this activity next to 42% of the state's population, the largest portion of that population living along the east side of Anchorage. I would like to see a plan for urban warfare training that is realistic, training that does not create a false sense of security by denying the existence of 42% of Alaska's population.

Fire Management 11

USARAK is in the process of preparing a fire management plan.

Fort Richardson Fence 19

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Wildlife and Fisheries 28

Descriptions of wildlife management projects are included in the INRMPs and are summarized in Appendix H.

Other 18

The Davis Range complex has been sited to meet safety and training needs. A final Fort Richardson Range Upgrade EA has been completed and is available for review (Stout 2002c).

Rec'd
SEP 9 2003

U.S. ARMY ALASKA TRANSFORMATION
DRAFT ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 8-30-03

COMMENTOR'S NAME: S. Betsy Christie

COMMENTOR'S ADDRESS: 914 High Grade Way
Fairbanks, Alaska 99712

COMMENTOR REPRESENTING: Self ☒ Organization ☐

ORGANIZATION NAME: _____

ORGANIZATION ADDRESS: _____

PLEASE SEND ME A COPY OF THE FINAL EIS: Yes ☒ No ☐

PLEASE CHOOSE ONE:
PAPER COPY ☒ CD ☐ EXECUTIVE SUMMARY REPORT ☐

COMMENTS: I have reviewed the Draft EIS for the
Transformation of the U.S. Army Alaska that I received
from you. Thank you!

The part in the manual that concerns me is the
impacts of proposed actions on wildlife populations. Give
a lot of moderate impact is expected, all of it negative,
to moose, waterfowl, caribou, wolverine, grizzly bears and

Wildlife and Fisheries 29
Thank you for your comment.

owls under alternative 3+4. I believe that even
 alternative 1 (no action) is having too much of an
 impact already.

I spend a big pleasurable time watching eagles
 wildlife and feel my views on the subject are important, too.

One of our missions here on earth is to maintain or
 help wildlife populations grow & thrive - to leave for
 future generations. Our shortsightedness, greed and
 paranoia are overruling our wisdom and far-sightedness
 right now. It is my opinion that Alternatives 3+4,
 with their moderate impacts on so many wildlife
 species, are unacceptable and should not be followed.

Thanks for notifying me - and I hope my

views are taken into account in this issue!

Thanks,

S. Robyn Chivers

Alternatives 07

Thank you for your comment.

RETURN THIS COMMENT FORM TO:

Gale A. Skaugstad
 Public Outreach Coordinator
 Environmental Resources Department
 Building 3023, Engineer Place
 Fort Walnwright, AK 99703

OR SUBMIT YOUR COMMENTS AND MAILING REQUESTS VIA E-MAIL OR THE
 INTERNET:

USARAK_EIS@cemml.colostate.edu
<http://www.cemml.colostate.edu/AlaskaEIS/comments.htm>

SEP 9 2003

August 28, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV (Skaugstad)
1060 Gaffney Road, #6500
Fort Wainwright, AK 99703-6500

Re: Comments / Draft EIS Transformation of U.S. Army Alaska

Dear Sir:

I would like to submit the following comments to this document:

Section 3.14.4.1 Access

In addition to Chugach State Park lands, Fort Richardson also borders BLM (Bicentennial Park) lands to the south. Established trails existing between Military and BLM lands have had public use for many years.

Section 3.14.4.3 Recreation

In addition, trails exist on Fort Richardson connecting to BLM (Bicentennial Park) to the south and have been heavily utilized by the public for many years.

Section 4.9.6.2.1 Wildlife (Proposed Mitigation)

Would suggest that the monitoring program be conducted on an annual basis and include a database establishing current wildlife inventories, habitat conditions, and movement patterns in order to effectively monitor changes. Actions to mitigate negative changes to wildlife to be acted upon annually.

Section 4.11.6.2 Proposed (Wildfire mitigation)

Provide appropriate fire vehicle access points to protect homes and private property located adjacent to USARAK lands.

Section 4.14.4.2 Alternative 3

Add: Provide continued trail access and connections to Chugach State Park & BLM (Bicentennial Park) lands south of USARAK lands from residential lands to the west (Davis Range).

Section 4.14.6.2 Proposed (mitigations)

1. Develop user-friendly information systems to notify the public of dates and times when active training will be occurring on USARAK lands. Publication

Public Access and Recreation 08

Text has been modified to address this comment. Please see Section 3.14, Public Access and Recreation.

Wildlife and Fisheries 30

Descriptions of currently planned wildlife monitoring projects can be found in Appendix H.

Fire Management 12

Thank you for your comment.

Public Access and Recreation 09

Thank you for your comment.

Page 2 Comments

2. In local newspapers, news bulletins, call-in 'hotline', publish 'calendar of training dates for year', etc.
3. Initiate simple permitting process for public access to USARAK lands during non-training periods. Interested users would get a permit from the Fort Rich MPs, something like a regular I.D. card. Before going on Army land you call a recorded number to see if the Army has any training going on. If not, you call the MPs and leave your I.D. card number etc. They would control the type of use, e.g. no motor vehicles etc, also would control what trails, areas, hours etc you may enter. If you get caught abusing your permit in any, it is forfeited. This is much like the procedure the State Forest Service uses with class C burn permits. You get the permit but before you can burn you must call a recorded number to see if there is a burn ban. If burning is allowed, you call a second number to announce where and how you are going to burn. They make note of that and you must call each day to continue the process. It's really very simple.

Respectfully submitted,



Kenneth E. Pendleton
 8631 Vigor Circle
 Anchorage, AK 99504
 (907) 337-5023
kenpendleton@alaska.com

cc: Harry Crawford

Public Access and Recreation 10

An automated phone call-in system, USARTRAK, simplifies access to information on training closures. Please see Appendix H.

September 2, 2003

Directorate of Public Works
ATTN: APVR-WPW-EV (Skaugstad)
1060 Gaffney Road, #6500
Fort Wainwright, AK 99703-6500

Re: Comments / Draft EIS Transformation of U.S. Army Alaska

Dear Sir:

I respectfully submit the following comments on this document addressing the sections pertaining to the Davis Range, Fort Richardson, Alaska.

I read in this document that there is no need for added security in order to adopt this expanded training proposal and Stryker training program. I am concerned to read that added security in the form of a security perimeter fence is required for this training, that this was omitted from this EIS, and that possibly this security fencing project was illegally left out of this document and presented separately as an Environmental Assessment.

I am concerned that you say that a moderate affect on migratory birds which use the western edge of this range is acceptable.

I am concerned that live fire practice is occurring within 1 mile of an elementary school.

I am concerned that a moderate increased risk of wildfire will be created, when the area being used is within a few miles of residential areas.

I am concerned about increased noise during training exercises to be endured by the neighboring subdivisions.

Thank you for the opportunity to submit my comments.

Judy Pendleton
8631 Vigor Circle
Anchorage, AK 99504
(907) 230-3752

SEP 9 2003

Fort Richardson Fence 20

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Wildlife and Fisheries 31

Thank you for your comment.

Human Health and Safety 24

Existing USARAK and Army regulations, including AR 210-2, TC 25-8, AR 385-63, AR 385-64, and 350-2, govern safety measures in range design and range training use. In addition, ranges have been located east of Bulldog Trail and are oriented away from Bulldog Trail. USARAK maintains all training operations, including firing fans, within the boundaries of its lands.

Fire Management 13

Proposed fire mitigation can be found in Section 4.11.6, Fire Management.

Noise 07

Noise levels would not be significant. Mitigation would include monitoring of noise levels with actual firing data.

Date: 9/9/2003
 William P. Wielechowski
 8603 Turf Ct.
 Anchorage, AK 99504
 wielechowski@yahoo
 Northeast Community Council

Directorate of Public Works
 ATTN: APVR-WPW-EB (Skaugstad)
 1060 Gaffney Road #6500
 Fort Wainwright, Alaska 99703-6500

Via Website Comment Address: <http://www.cemml.colostate.edu/alaskaeis/comments.htm>

Re: Comments regarding Draft EIS for Transformation of U.S. Army Alaska

I respectfully submit the following comments for this project on behalf of the residents of the Northeast Community Council. I submitted oral comments, and would like to take this opportunity to provide more comprehensive written statements. Our Council is composed of approximately 30,000 East Anchorage residents. We are supportive of the military and its transformation efforts. These comments reflect the concerns that have been voiced by community members. All comments pertain to the impacts that this project will have on the Fort Richardson base and surrounding areas.

Our Community directly abuts the southern portion of Fort Richardson. Unfortunately, we were not directly notified of the Transformation during the scoping process. We would have liked to have been involved at an earlier stage, and hope that in the future we will be involved in actions that will impact our community.

The biggest concern for our Council is the proposed fence along the Fort Richardson boundary and Muldoon area. We believe the fence environmental assessment is significantly flawed, and will severely impact our community. More

Other 19

Announcements for scoping meetings were made in the Anchorage Daily News during February 2002 (See Section 1.9, Scoping). Your organization will be placed on the USARAK mailing list for future environmental and resources-related issues.

Fort Richardson Fence 21

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort

detailed comments regarding the proposed fence have been sent in the environmental assessment regarding that project. The environmental assessment pertaining to the fence project states that one purpose of the fence is to support the Transformation. However, nowhere in the comprehensive Transformation EIS does it state that any fencing is necessary. To the extent that any fence is required for the Transformation, then this EIS is significantly flawed since it does not address the impacts of that project, and instead evaluates them in a piecemeal fashion. These piecemeal assessments make it impossible for us to properly assess the cumulative impacts of these government actions.

We are also concerned that other projects related to this Transformation have been evaluated in a piecemeal fashion, such that we are unable to truly grasp how these projects are impacting our community. For example, some construction being performed at the Davis Range was not evaluated in this EIS, and apparently was assessed in a separate document.

Concerns have been raised about how the additional forces will impact our public schools and social services. Currently, many of our schools are operating well above capacity. The Transformation will bring in several hundred families into our community. While this expansion will certainly be good for our local businesses and economy, education costs in Anchorage exceed \$10,000 per student. The EIS does not assess the impacts of hundreds of additional children in our schools and does not appear to provide funding for their public education.

Section 3.18.4.3 of the EIS states that no dangerous training will occur near any schools or child care facilities.

However, the Davis Range is being expanded to allow hundreds of thousands of rounds of live ammunition. This

Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Fort Richardson Fence 22

USARAK is considering the installation of a boundary fence for the cantonment area at Fort Richardson to further Current and Future Force protection requirements. Design and placement alternatives are being developed. Any decision to pursue Fort Richardson fencing will require NEPA documentation and analysis, and will consider the cumulative impacts of fencing which might result. Please see Section 4.20.3.2.1.

Socioeconomics 16

Socioeconomic analysis concludes overall impacts to public and social services in the Anchorage area would be minor. Please see Section 4.13.4.4.2, Socioeconomics.

Socioeconomics 17

Further analysis has been added to address impacts to the Anchorage and Fairbanks North Star Borough school districts. Federal Impact Aid for education is designed to offset the lack of local property taxes on federal properties within school districts. This aid would increase according to enrollment of on-post students. On Fort Richardson and Fort Wainwright, Federal Impact Aid more than offsets the lack of local property tax revenue from students living on post. Students living off post are on properties that contribute to the property tax base just as other local residents do. Please see further discussion in Sections 3.13 and 4.13, Socioeconomics.

Human Health and Safety 25

Existing USARAK and Army regulations, including AR 210-2, TC 25-8, AR 385-63,

ammunition has a range of several thousand meters, yet is less than one-half mile from Muldoon Elementary School. It does not appear that the EIS has adequately assessed or mitigated the impacts of this danger. Moreover, thousands of residents' homes are within this firing range.

The EIS states that there will be "severe impacts" to soil conditions in the area. Since some of this training occurs very close to homes, residents have expressed concern that this will lead to damaging erosion to abutting properties and could significantly impact wetlands, creeks, streams and rivers.

Under Alternative 3, there will be a 70% increase in rounds fired, and under Alternative 4, there will be a 165% increase in rounds and high explosive rounds fired. Residents are concerned about this increased frequency and the amount of noise that will result from these increases. There is also significant concern regarding the potential increase in wildfire danger, which is assessed in the EIS as "moderate." Since this is an identified increased risk, significant efforts should be made to protect the surrounding residential areas.

The EIS notes there will be moderate impacts to numerous wildlife and millions of birds that migrate through the area. Wildlife is important aspect of our community and it is our hope that efforts will be made to minimize these impacts, consistent with the military's mission.

Under Alternative 4, there will be "moderate" impacts to nearby traffic. This is a major concern in our area and we hope that efforts will be made to alleviate traffic congestion.

We are happy to see that there were only minor impacts to recreational activities on Fort Richardson. It is our hope that recreational use of Fort Richardson will continue at or near the current levels. As the EIS acknowledges, this area has long been respectfully used by neighboring residents for recreational purposes and we look forward to

AR 385-64, and 350-2, govern safety measures in range design and range training use. In addition, ranges have been located east of Bulldog Trail and are oriented away from Bulldog Trail. USARAK maintains all training operations, including firing fans, within the boundaries of its lands.

Geology and Soils 02

Impacts to soils would be expected to result from localized rutting and would not affect abutting properties. Analysis of impacts to wetlands and surface water can be found in Sections 4.5, Surface Water, and 4.7, Wetlands.

Noise 08

Analysis of noise impacts can be found in Section 4.16, Noise.

Fire Management 14

Fire mitigation can be found in Section 4.11.6, Fire Management.

Wildlife and Fisheries 32

Thank you for your comment.

Human Health and Safety 26

Moderate impacts would be expected to traffic on some routes. However, moderate traffic impacts would not be expected to areas southwest of Fort Richardson along the Glenn Highway. Mitigation measures can be found in Section 4.17.6, Human Health and Safety.

Public Access and Recreation 11

Thank you for your comment.

continuing that usage in the future, consistent with the military's mission.

Thank you for this opportunity to provide comment on this important project.

Very truly yours,

William P. Wielechowski,
President, Northeast Community Council

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9.5 INDEX OF COMMENTS AND RESPONSES

9.5.1 Index of Comments and Responses by Topic

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