

CHAPTER 9

COMMENTS AND RESPONSES

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COMMENTS AND RESPONSES

This chapter contains the Army's responses to comments received on the Draft Legislative Environmental Impact Statement (LEIS) for the Alaska Army lands withdrawal renewal. A summary of the public comment process, including the approach to analyze the comments is presented in Chapter 9.1. Comment letters and verbatim transcripts from the public hearings are reproduced in Chapter 9.2. The Army's responses to the comments are also located in Chapter 9.2. Publications cited in the responses can be found in the Bibliography in Chapter 6. Each comment letter or transcript was assigned an alphabetic code. Comments were coded in the order of acquisition. Within each comment letter or transcript, individual points presented were assigned a topic code. Topic codes used in the comment/response process are defined in Table 9.a. Each topic code was subsequently assigned a unique numeric code. For example, comment/response ACC-A001 refers to the first comment (001) dealing with the topic of access (ACC) presented in comment letter or transcript A. An index of individual comments and responses grouped by topic code and the commentor's last name is located in Chapter 9.3. This process resulted in 439 coded comments, which formed the basis for the responses in Chapter 9.2.

Individual responses were prepared for all input received during the public comment period. Like comments may have received identical responses.

9.1 SUMMARY OF PUBLIC COMMENT PROCESS

The Notice of Availability (NOA) of the Draft LEIS was published in the Federal Register on November 6, 1998. Announcements of the availability of the Draft LEIS and plans for public hearings/open houses were subsequently published in the *Fairbanks News-Miner*, *Delta Wind*, and *Anchorage Daily News* newspapers. The Army distributed 500 copies of the Draft LEIS, including those sent to community libraries throughout the project area.

The public comment period began November 6, 1998, with publication of the NOA, and closed February 7, 1999, for a total of 90 days. Verbal comments were recorded at public hearings held in Fairbanks, Delta Junction, and Anchorage. Some 37 written and 10 oral comments were provided by Federal, State, and local governmental agencies; special interest organizations; businesses; and individuals.

Of the written and oral comments received during the 90-day comment period, two were from Federal agencies, five from State agencies, one from local governments and agencies, eight from special interest organizations, one from local businesses, and 30 from individuals. A majority of the written comments came from Fairbanks and Delta Junction residents. Eleven comments postmarked after February 7, 1999, were reviewed and included in this analysis.

Public hearings were held in three communities in Alaska (with the number of attendees who registered shown in parentheses): Anchorage (4), Delta Junction/Fort Greely (14), and Fairbanks/Fort Wainwright (46). It is likely that some individuals chose not to register, so attendance may have been slightly higher than is indicated.

All comment letters and hearing 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 LEIS was revised accordingly. Reference to the revised sections is made in the responses to specific comments. Some comments did not require a response or change to the LEIS. These expressions of opinion or preference were noted.

9.2 COMMENTS ON THE DRAFT LEIS AND ARMY RESPONSES

This chapter contains comments received during the Draft LEIS comment period and the Army's responses to them. Publications cited in the responses can be found in the Bibliography in Chapter 6. Comments were coded and are presented in the order of acquisition. Topic codes used in the comment/response process are defined in Table 9.a.

Table 9.a Definition of Topic Codes Used in the Comment/Response Process

Code	Topic	Code	Topic
ACC	Public Access	OTH	Other Comments
AIR	Air Quality	POL	Pollution
ALT	Alternatives	REC	Recreation
CULT	Cultural Resources	SOC	Socioeconomics
FIRE	Fire Management	SOIL	Soils

Table 9.a Definition of Topic Codes Used in the Comment/Response Process

Code	Topic	Code	Topic
FISH	Fisheries	SUB	Subsistence
FOR	Forestry	TES	Threatened or Endangered Species
GEOL	Geology	USE	Military Use
GLAC	Glaciers	VEG	Vegetation
LAND	Land Use	WATER	Water Resources
MIN	Mineral Resources	WET	Wetlands
MIT	Mitigation	WILD	Wildlife
NOISE	Noise		

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PUBLIC COMMENTS REGARDING
THE DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT
ALASKA ARMY LANDS WITHDRAWAL RENEWAL
U.S. ARMY ALASKA
DEPARTMENT OF THE ARMY

Proceedings Held at
The Diamond Willow Club
Ft. Greely, Alaska

HEARING PROCEEDINGS HELD ON
Tuesday, January 5, 1999

Volume 1 of 1
Pages 1 to 11, inclusive

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

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P R O C E E D I N G S

(The following is the statement of Ms. Jennifer
East-Cole, taken at 3:44 p.m. on January 5,
1999, in Delta Junction, Ft. Greely, Alaska.)

MS. EAST-COLE: I think I have several points,
several comments I want to make. The first one is that I
think a 50-year long — 50-year contract is too long.
There are too many things that can go on in that period
of time, and it's just too inflexible of a length.

I have a concern — my second problem is I have
a concern about the long-range plan for this area. Is

ALT-A001

RESPONSES TO COMMENT A

ALT-A001: Noted. The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

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there a possibility that they will increase the magnitude and frequency of bombing? And if there is, this is a serious concern.

I was told by some of your representatives that this bombing range will stay status quo, but that's only as it relates to the size of the area. And again, my concern is will the frequency of bombing increase and the types of bombs, can that change?

My third concern is I really don't see this helping the economy of the Delta/Ft. Greely area. They are shutting down the base, so most of these people are going to be coming up from Fairbanks. It's going to help Fairbanks' economy, but I really don't see it doing anything for Delta.

My fourth concern is I feel like all Delta stands to gain by this is that it would increase the pollution, noise pollution, water pollution, soil pollution. People drink the water, and it can damage the people. The people hunt the animals that range out on that bombing range. If the animals eat — eat food and the people eat the animals, what's that going to do to the people's health?

Also, too, the pollution can — there's a serious destruction of wildlife and fish habitat. In particular, my concern is there's a 30-mile stretch along the Tanana River that is just to the north of the bombing range, and this is critical salmon habitat, as noted by Fish and Game. How would this affect that salmon habitat?

My fifth concern is that if they continue to use this area as a bombing range, there will just be more duds out there and more damage done to the area, which just means that more money would have to be put into it to clean it up. It's already going to cost — it's almost cost prohibitive now to clean up this area.

If the contract is extended another 50 years, I do not see this area ever being cleaned up. And so much of what my concerns about the fish and the wildlife and

USE-A001

USE-A001: The Military Lands Withdrawal Act, which authorized the withdrawals at Fort Wainwright and Fort Greely in 1986, reserved the withdrawal lands for military maneuvering, training, equipment development and testing, and training for artillery firing, aerial gunnery, infantry tactics, and other defense-related purposes. The Act did not restrict the amount of military activity permitted. Presently, the Army and Air Force do not have plans to increase the magnitude or frequency of bombing on the withdrawal renewal lands. Proposed military activities on the withdrawal lands for the renewal period will be consistent with those conducted during the past 15 years.

SOC-A001

SOC-A001: The Base Realignment and Closure is not within the scope of this LEIS. NEPA documents, including Environmental Assessments are being prepared to analyze the impacts of the realignment on Fort Wainwright and Fort Greely. The Environmental Assessment for Realignment of Personnel and Military Functions to Fort Wainwright was published in June 1997. It is anticipated the Environmental Assessment for Realignment of Personnel and Military Functions from Fort Greely will be published in October 1999.

POL-A001

POL-A001: No expansion or addition of Impact Areas would occur under the Preferred Alternative. With continued military use of the withdrawal lands, impacts to water, soil, and wildlife would occur. Existing and proposed mitigation should decrease adverse impacts.

Our investigation to identify contaminants and their environmental fate revealed a lack of data for interior Alaska. Agencies responsible for monitoring contaminants have not conducted studies specific to the withdrawal areas. Information available on chemicals used in munitions expended on the withdrawal lands has been incorporated into Appendix 2.C. The baseline data presented in the table is not an analysis of contamination on the withdrawal lands, but rather a general description of the environmental fate of each chemical.

Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources. Please refer to Chapter 4.23 for specific guidelines for the monitoring and remediation program.

FISH-A001

FISH-A001: Please refer to proposed mitigation in Chapter 4.23 concerning pollution. At the present time no State or Federal agency has expressed concern about military actions affecting the critical salmon habitat. Through the proposed mitigation, the Army will determine if contamination from military activity occurs.

POL-A002

POL-A002 and A003: Routine decontamination operations are conducted each year on the Stuart Creek and Oklahoma/Delta Creek Impact Areas by the Air Force. Each year, all unexploded ordnance and inert residue are cleared to a radius of 1,000 feet from each of the Air Force's tactical targets. The access ways into the tactical targets and 100 feet on either side of the access ways are also cleared each year. The Air Force's routine decontamination operations are conducted on the Army's Impact Areas they utilize for training. An ordnance clearance history by the Air Force is in Appendix 2.C.

The Army does not currently conduct routine decontamination operations on the Stuart Creek and Oklahoma/Delta Creek Impact Areas. However, all unexploded ordnance accumulated during Army training in the Lakes Impact Area is accounted for when training is completed. This allows public access into these Impact Areas. The Washington Impact Area is cleared of ordnance periodically to allow for Cold Regions Testing Center (CRTC) testing. The Mississippi Impact Area is classified as a High Hazard Impact Area with unexploded ordnance. The Washington and Texas Ranges are shooting ranges utilized by the Army for firing artillery. These Ranges are regularly cleared of artillery residue by the Army.

Proposed mitigation is outlined in Chapter 4.23.

POL-A003

Guidelines for detection and clearance of ordnance state that "environmental impacts from unexploded ordnance clearance could range from minimal to significant depending upon the amount of vegetation that must be removed, depth and areal extent of remediation, and excavation method used. All of these factors must be considered and balanced against potential risk and the degree of risk reduction that could be achieved" (Department of Defense Explosives Safety Board et al. 1996).

Cost and lack of unexploded ordnance characterization and excavation technologies are two major impediments to efficient and effective clearance of unexploded ordnance. As technologies improve, the effectiveness of remediation should increase and the time, cost, and environmental impacts for remediation should decrease.

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pollution to the people is going to become more of a cumulative effect over time.

And that's it. And thank you for allowing me to comment. And I — if you could please respond, I would love to hear from you.

Sincerely, Jennie East-Cole.

(Statement concluded at 3:50 p.m.,

January 5, 1998.)

(The following is the statement given by

Mr. Jack Morris at 6:05 p.m.,

January 5, 1999.)

MR. JACK MORRIS: Okay. My name is Jack Morris from Delta Junction. And I have three or four issues that I would like to have recorded, and questions.

The first one we would deal with is public access to the buffer areas of the 2202 impact area. It's been my concern that as impact area uses increase, that recreation and public access to the buffer areas will be limited to the point that eventually we have none.

And it — I think we need formal language written. There is a range policy 350-2 that talks about the language of September 1 through the 25th of having range cleanup. I would like to see that formal language increased to have range cleanup and allow hunting, moose hunting in the buffer zone of 2202, specifically in the Delta Creek and Little Delta areas.

At the present, it says that there will be a range cleanup during September 1 through 25, but it does not specifically state that the buffer zone will be allowed public access, specifically hunting during that time. I would like to see that issue changed.

It's been brought to my attention that the corridor accessing the west fork of the Little Delta by use of the Little Delta River is always going to remain open. It is a VFR federal flight path, and it's a — we can fly through there any time there's VFR, and that there is no plan in the future to ever close that corridor to access behind the 2202 impact area.

The second item that I would like to talk on is

ACC-A001

ACC-A001: The Army may increase the use of the Impact Areas which would increase closure of the Buffer Zones. Presently, the Army and Air Force do not have plans to increase the magnitude or frequency of bombing on the withdrawal renewal lands. Proposed military activities on the withdrawal lands for the renewal period will be consistent with those conducted during the past 15 years.

ACC-A002

ACC-A002: The Army cannot ensure the Buffer Zone will remain open for hunting during the month of September. Historically, September has been utilized for range maintenance. The military utilizes this period for annual Impact Area decontamination and target maintenance. To date, it has not resulted in the training lands being closed to the public. The Army acknowledges that the month of September is critical for hunting on the withdrawal lands and tries to accommodate the needs of the public.

ACC-A003

ACC-A003: The military has no intention of increasing the size of the Restricted Areas. Civilian pilots can fly through or around them but should contact the Special Use Airspace Information Service (1-800-758-8723 or 907-372-6913) to receive an update on military activity.

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in 1990, the Army environmental hygiene group did a water — tried to set up a water baseline on munitions contaminations of 100 Mile Creek and Delta Creek. What they did is they took water samples out of 100 Mile Creek, Delta Creek, and compared them to water samples out of the Little Delta River. The water on the 100 Mile Creek, for munitions to enter into this flowing water, it would have to come by seepage through the tundra. So there's a lot of filtering. In other words, there are no active munitions in that river. Delta Creek, on the other hand, has active munitions in the creek channel.

Now, in 1990, when this survey was taken, the amount of active munitions in the Delta Creek was not a near percentage of what there is now. I would like to see a new baseline, a new water sample taken. I know that during spring overflow, the overflow is backing into the Delta Creek targets, the craters are filling full of water. And then when breakup comes, these waters are washed out of these craters, down the Delta Creek, and into the Tanana River.

I would like to see right after breakup, say, in June, new water samples taken, specifically of the Delta Creek, up by where the targets are. Not down at the mouth, but up by where the targets are, so that we can have an additional baseline comparison to see what's happening. Using the Little Delta as the water to compare it to, I think that will work fine because it's in the buffer zone and there are no munitions. That's the — that's two.

The third item that I wanted to address was roads and trails. Last winter, the winter of '97, '98, the 2202 lookout tower above the 100 Mile Creek, off of the Delta impact area, had a road built four or five miles to the north that dropped down on Delta Creek, then a road was built up Delta Creek across from the Sullivan Roadhouse, then the road went to the north and picked up the old Cat Trail, and proceeded in a northwesterly direction to Smithersville, where there was an

WATER-A001

WATER-A001: A water quality sampling program will be established for the withdrawal lands. The study effort will include an analysis of surface water bodies, with monitoring stations located directly upstream and downstream of the installations.

SOIL-A001: In 1997, the Army built "Simpsonville", a mock town or CALFEX range, on the west side of Fort Greely's Oklahoma/Delta Creek Impact Area to conduct air and ground assaults on targets. The Army used existing trails and roads (which were originally constructed by the Air Force) to access the area. The trails have been reclaimed by replacing the vegetative mat, but as a result, increased the saturation of soil in the area during the summer. These sections of trail will most likely be used indefinitely by the Air Force during the winter. The Army conducted these operations by permit under the authority of Section 404 of the Clean Water Act. Under the Section 404 permit, reclamation of damaged land is required.

"Simpsonville" was used for the first time during the winter of 1997-1998. In the process, a new trail was created, which directly accesses Delta Creek, and pallets may have been used. The Army will use "Simpsonville" again this winter, and their activities will be monitored by a member of the U.S. Army Alaska's Natural Resources Division. The Army will be responsible for any impacts to the environment and necessary reclamation including the installation of water bars on the trail leading to Delta Creek to minimize future soil erosion.

A second CALFEX range is proposed to be built closer to Main Post. The new site will be closer and easier to access, thus eliminating much of the traffic to "Simpsonville". A wetlands permit was obtained for the construction and use of "Simpsonville" and states that if the range is abandoned, then all debris must be removed and the land reclaimed.

SOIL-A001

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encampment.

I talked to Steve Reidsma about this, and he's agreed that there is problems with that road. I noticed that this summer we had a tremendous amount of erosion, especially where the road entered the Delta Creek. The — on the tundra, parallel in Delta Creek on the way to Smithersville, they left pallets buried in the lowlands where they were getting stuck when they pulled out of there late in the summer.

I would like to see these issues addressed. Steve says they are aware of it and that they are going to take and close that Smithersville, and that they are going to go in there and try to stop the erosion. But I would like it to be noted that we are aware of it and that there is a problem and it needs to be done there.

I think that's it.

(Off record, then back on record.)

MR. JACK MORRIS: Oh, let me add one more thing.

I want to compliment the range control at Eielson for the communications network that they have set up for the local pilots, so that we can communicate on the same frequency, and so that we can work together for access into these areas. I think it's a wonderful system.

I really enjoyed coming to this meeting tonight because I got to make contact with people that if we — when we have problems in the future, I've got someone I can contact. And the thing that I was surprised about is that these people are aware of some of these problems that I'm talking about. They are aware of them and are working to change these. That is a very positive thing. Okay.

(Statement concluded at 6:13 p.m.,
January 5, 1999.)

(The following is the statement by
Mr. Whit Hicks at 6:20 p.m.,
January 5, 1999.)

MR. WHIT HICKS: Just after reviewing the volumes that you've put out and then the posters up in the room, it kind of all stops at the socioeconomic

ACC-A004

ACC-A004: The military appreciates your acknowledgement of the Special Use Airspace Information Service. Input from the public on this and other military communication methods is encouraged.

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stand, at least as far as this region goes. It seems that the withdrawal is trying to be separated from realignment, which is not — it's an impossible thing to do, in reality. If you take — take out any economic benefit, at least to the Delta/Greely community, then every other impact is negative.

Some of the specifics I see from that, reduced public use, restricted minimal entry, a high level of environmental impact from explosives and from the road construction that's happened on around the — in the impact areas. I don't think that there's accurate or enough information on the impact and wildlife, another reason. And the other impacts are perhaps more minor, but they — they are still negative if there's no return to the community.

A couple of issues, aside from the economics, having a 50-year withdrawal, I realize it's been studied and analyzed from every direction, maybe except from mine. That's a pretty absurd thing to do, given the dynamics of world economy and this country's economy and our local economy, and other things that we haven't even considered yet, a 50-year blanket withdrawal without a real serious review on a 5 to 10-year basis is — that should be unacceptable.

It seems that the military has had a — there's been a dual standard as far as environmental permitting and the activities that — the impact that's been allowed to happen by the DOD. There's obviously a dual standard there. And I don't know how that can — how that can be. It shouldn't be. If anything, our military should be held to a higher standard, even, than private industry. But that is absolutely not the case, based on what we've seen here.

Well, all in all, if you're going to use — if there's going to be an impact, a negative impact to the region, which there is environmentally, just the public access, removing the access for minimal entry, which is restricting a revenue base for this community, then you need to pay for it. Any other — any other business or

SOC-A002

SOC-A002 and A003: The realignment process of Fort Greely required public hearings and National Environmental Policy Act (NEPA) documents be completed. The impact of realignment is beneficial to the Fairbanks area and detrimental to the Delta area.

The importance of the military to the Delta Area was highlighted in Chapter 3.19 with the negative effects of realignment discussed. The present study examined the effect of non renewal by indicating the impact on the Fairbanks North Star Borough Economy, not Delta Junction. There was no assertion that the Delta area would benefit economically from continued withdrawal as it had in the past.

Let it be stated unequivocally that the primary economic benefits to continued withdrawal are within the Fairbanks North Star Borough. Whereas Delta has had substantial economic benefits from the military presence in the past, this will be reduced after realignment is completed. Yet, the land will still be reserved from mineral entry, agriculture, or other alternative uses.

ALT-A002

ALT-A002: Noted. Periodic review of the Army's use and management of the withdrawal lands would occur under the Preferred Alternative. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. Plans are written for a 5 year period with public, Federal and State agency participation in the development process.

USE-A002

USE-A002: Federal agencies are generally held to the same level of standards when implementing projects and programs on their lands. This LEIS was completed as a requirement of the National Environmental Policy Act (NEPA). This Act establishes policies and goals for the protection of the environment. The NEPA process includes the systematic examination of possible and probable environmental consequences of implementing a proposed action. The Army is required to comply with NEPA, as are all other Federal agencies.

All Army actions fall into one of the following environmental review categories. The category determines the NEPA documentation to be completed. Categories are: 1) Exemption by Law, e.g. national security exemptions which prohibit or exempt compliance with NEPA; 2) Emergencies, e.g. immediate actions to promote national defense or security and actions necessary for the protection of life or property are excluded from NEPA to avoid delay of action; 3) Categorical Exclusions are actions which do not require NEPA documentation because they do not individually or cumulatively have a significant effect on the environment; 4) Environmental Assessment; and 5) Environmental Impact Statement.

SOC-A003

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entity in the country would have to pay, or return something for that use. And that's just not happening here.

If you're insistent upon looking at it on — the interior as a region, you can use Fairbanks numbers and make it look very positive economically. But if you're going to separate it from the realignment, then let's go ahead and take the bigger picture where there is no Ft. Greely and no economic — positive economic impact to our community at all, then it's just a lose-lose situation. We have our land mass, we have it impacted, we don't have access to minimal entry or tourism on those properties. And that's not just to the community.

That's about all I have.

(Statement concluded at 6:25 p.m.,

January 5, 1999.)

(No further statements were given on

January 5, 1999.)

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 proceedings, the various statements, 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 _____, 1999.

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

23 My Commission Expires: February 15, 2002

HEARTLAND COURT REPORTERS 907-452-6727

B

Fort Greely Lands Withdrawal Renewal

First, I support a strong military and I view its role as a protective one.

However, we now have the Army asking for a 50 year continuation of withdrawal from public use of over 660,000 acres to continue the 'mission' of Fort Greely. The effect would be to make this area impervious to outside concerns, even concerns expressed locally in the Delta Junction area, and prevent further reviews for the next 50 years!

How can this be so important, if the current Base Realignment indicates there will be very few military personnel located in this area? If you want to leave us, do so clearly and completely! We have the most powerful military in the world, but Delta residents did not expect it to turn on them. **Essentially, we have the US Army waging a very successful economic war on the Delta area, taking away jobs, jobs with which they once paid for the wanton destruction they do to this area.** Afterward they will continue the destruction and abuse of the land and the local people, perhaps at an increased rate!

If the US Army is intent upon removing civilian employment from the Delta area, then it would seem the best thing to do would be to completely close Fort Greely, and give it to the BLM. The next few generations of Delta residents could be gainfully employed cleaning up the Army's mess on the 660,000 + acres!

The picture on the front cover of the impact statement shows the natural beauty of this area. This is the view all tourists, visitors and local residents have from the Richardson/Alaska Highway. Why should this area be a bombing range? Delta would be better served by a loop road beginning south of Donnelly Dome, running eastward across the front of the Alaska Range, going north and then returning eastward to Delta Junction itself. This would create a 'tourist loop' unexcelled anywhere, including Denali National Park. The caribou, moose, sheep, grizzly, black bear and other populations could recover their natural habitat, and be there for tourists to see. In addition, local subsistence hunters could access these game populations, to feed their families. (Although the military might deny it, most hunters and fishermen do not want to deal with the military for access. Generally speaking, the local subsistence hunting population does not consider the military 'user friendly'.)

The military currently shakes our homes with their explosions, which we are also forced to hear. Tourists who stop here in the summer often can't believe our explanation of the 'thunder' they hear! Finding the tranquil, pristine wilderness they seek so terribly flawed, they frequently decide to look elsewhere in Alaska. And now the military is removing their economic support by way of local jobs, and expecting us to continue to endure their 'gifts'.

The military also provides us with smoke from their forest fires. This is a wonderful opportunity to test your lungs. We do not appreciate summers spent breathing smoke. Never, during any of these fires, has the military attempted to find those vulnerable to

RESPONSES TO COMMENT B

ALT-B003: Noted. Periodic review of the Army's use and management of the withdrawal lands would occur. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. The plans are written for a 5 year period with public, and Federal and State agency participation in the development process.

SOC-B004: Noted. Thank you for your comments.

ALT-B004: If Congress does not renew the military land withdrawals in Alaska, future management of the withdrawal lands will be determined by the agency who has jurisdiction over the lands. This could be the Bureau of Land Management or State of Alaska.

ALT-B003

SUB-B001 and B002: You make the point that the hunting regulations on Fort Greely, e.g., requirements to check-in and check-out, discourage subsistence users. It is not the intent of U.S. Army Alaska to discourage use, but rather to provide a means to allow use without significant disruption of the military mission or undue exposure to human safety hazards created by military operations.

U.S. Army Alaska is planning to implement hunter education certification, as required by Department of Army Regulation 210-21 on January 1, 2000. The Army recognizes there is a lack of instructors in the Fort Greely area and is working with the Alaska Department of Fish and Game to get classes scheduled on Fort Greely.

SOC-B004

There are fewer requirements for recreational or subsistence hunting on Fort Greely than are normally found on military installations with similar missions within the United States. U.S. Army Alaska will continue to review means to minimize both the inconvenience involved with public use of Fort Greely and costs of administering the user-access program, but continuation of the military mission and minimizing human safety risks will continue to be important factors.

ALT-B004

NOISE-B001: Noise impacts from the military would continue under the Preferred Alternative as has occurred on the withdrawal lands over the past 50 years. Subsonic aircraft flights are the dominant military noise source (subsonic flights occur at speeds below the speed of sound level and so not produce sonic booms).

Overall, few noise complaints have been received by the Army for artillery, explosions, or small arms firing. Most noise complaints have been from helicopter overflights while traveling from the Fort Wainwright Airfield to the Fort Wainwright Yukon Training Area or Fort Greely. As Army use of the relatively loud UH-1 "Huey" helicopter shifts to the quieter UH-60 Blackhawk helicopter, noise complaints are expected to decrease (Zeman, pers. com. 1998). Noise complaints received by the U.S. Air Force for jet aircraft in the vicinity of the Yukon Training Area and Fort Greely average 24 complaints per year (Gifford 1998). The noise is usually from low flying aircraft entering or exiting an Impact Area.

Mitigation measures are listed in Chapter 4.22 and Chapter 4.23.

SUB-B001

NOISE-B001

FIRE-B001

FIRE-B001: The Army is concerned about smoke and air quality during fires. Military personnel and their families are subjected to the same exposures as the civilians of Delta Junction and Fairbanks. The Alaska Department of Environmental Conservation (ADEC) is the regulatory agency responsible for air quality and smoke management on both State and Federal lands. Written approval is required from ADEC for prescribed burns, other than those used to combat wildland fire. ADEC is responsible for issuing air quality advisories and declaring air episodes. A representative from ADEC is on the Alaska Wildland Fire Coordinating Group. During a wildland fire, air quality and smoke management issues are addressed. Press releases are issued with recommended actions that individuals can take to protect their health.

The Army does take measures to decrease the potential of fires from incendiary devices. Information on these measures can be found in Chapter 4.15 under Existing Mitigation. Also read the response FIRE-C002.

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the conditions they create and attempt to provide assistance to them! During this most recent fire there were reports that live ordnance had been found six miles north of the Fort Greely boundary. How safe are we if the military has difficulty dropping their bombs on the 660,000+ acres they now have?

Between Delta and Fairbanks the Richardson Highway consists of two lanes. I have personally met almost one hundred military vehicles in convoys while I drove between between my home in Delta and Eielson Air Force Base. During this trip there were two occasions where people attempted to pass and came close to hitting me. Convoy vehicles were too close together, and they could not get back into their own lane. Does the cost of increased transportation of military personnel justify their regular transport between Greely and other bases? How about using air transport and clearing our highways? Perhaps the military should build a four lane highway between Eielson and Greely to eliminate the potential for injury and loss of life to civilians traveling this route! Perhaps Fort Greely should be closed!

If this draft environmental impact statement is complete, how was the Dry Creek community overlooked? It is larger than both Healy Lake and Dot Lake, and located physically closer. This is a relatively large group of people who do harvest wild game for personal consumption.

On page 2-10, would you please explain how the 13 Firing Ranges located in the West Training Area are EAST OF THE DELTA RIVER?

On page 3-17 you mention that the "Geology and geochemistry in this area of the withdrawal are similar to the Pogo deposit (Smith et al. 1998)." As the Pogo mine is regarded as perhaps the richest gold deposit in Alaska, and perhaps the world, what possibility is there for potential development? Gold mining could certainly provide jobs that the military is currently taking away from the Delta area.

Page 3-89--It seems the military is ignoring archeological work that must be done in these areas. Current efforts by the military are more in line with obliterating them.

P 3-97 Socio economics--Again, the Dry Creek community is ignored. They are larger than Dot Lake and Healy Lake, as well as being closer. Don't you even know they are there? If not, why not?

Subsistence: 3-106 et al--Federal agencies tell residents of Delta Junction that there is no federal land near Delta for them to provide a subsistence priority on. Yet the Federal Government has 660,000+ acres butted up against our city limits! Wake up, military, you do nothing to encourage subsistence hunters to use military lands. In fact, present policies discourage it. You will soon put into place a requirement for hunter education certification, yet there is no current way Delta residents can comply since there is no hunter education certification available here. This can be construed as an indirect means of denying access, as can other procedures, such as having to

USE-B003: During the 1998 Carla Lake fire, live ordnance was located approximately 2 km north (the outer limit of the Buffer Zone) of the Kansas Lakes Impact Area, close to the Oklahoma Impact Area, and approximately 3 km inside the military reservation boundary. The ordnance was from the 1940s or 1950s. An explosive ordnance disposal (EOD) team was called in and the ordnance was destroyed.

OTH-B001: Movement of troops and vehicles occur between Fort Wainwright and Fort Greely. Large convoys occur primarily during the military's major training exercises. Military use of Fort Greely will continue

USE-B003

OTH-B001

SOC-B005

USE-B004

MIN-B001

CULT-B001

SOC-B006

SUB-B002

REC-B001

under the Preferred Alternative. Affects on convoys as a result of the BRAC action at Fort Greely are outside the scope of this withdrawal renewal action. Those affects should be addressed in the NEPA documents being prepared in accordance with BRAC.

SOC-B005 and B006: As indicated in the report, there is no specific Delta "area" that may be conveniently referred to because most of the area is unincorporated, including the area referred to as "Dry Creek". Many places in interior Alaska are referred to by milepost, by topography, etc.

The religious community of Whitestone Farms was mentioned in the report, which is principal to the settlement of Dry Creek. But its location was incorrectly placed near Big Delta. The state Department of Community and Regional Affairs lists the current population of Dry Creek at 134. It is West of Tok and East of Delta on the Alaska Highway.

USE-B004: The West Training Area of Fort Greely extends from the Little Delta River on its western boundary to east of the Delta River near the Richardson Highway (see Figure 1.a). The 13 Firing Ranges on the West Training Area are located east of the Delta River (see Figure 2.c).

MIN-B001: Rocks in the southwest part of the Fort Greely withdrawal (Figure 3.5.b) are similar to those in the Pogo area. However, the areal extent of exposed rocks is actually quite small compared to the size of the withdrawal. Most of the withdrawn lands are covered by floodplain deposits and thick overburden, and there are very few outcrops. It should be noted that the Pogo deposit is some 400 feet below ground, and its geology is very complicated. If not for the extremely high grade of the ore at Pogo, development would not have been economically viable.

CULT-B001: U.S. Army Alaska has completed a five-year *Draft Integrated Cultural Resources Management Plan* for Fort Wainwright and Fort Greely in cooperation with the Alaska State Historic Preservation Office. The draft plan sufficiently addresses both the inventory and protection of archaeological sites. The Army complies with all applicable laws concerning cultural resources sites.

REC-B001: The Provost Marshall's Office plans to implement Army Regulation (AR) 210-21, dated May 1997, which states that any person hunting with a firearm on U.S. Army Alaska (USARAK) lands must first attend an 18 hour, National Rifle Association certified (or equivalent) hunter safety course. Persons who only fish or trap on Army lands are exempt. This regulation is set to be in place January 1, 2000.

Currently Alaska is the only state in the country that does not require a hunter safety course to hunt statewide. The State does plan to require this in the future. Implementation for the Interior (Fairbanks, Delta Junction area) is scheduled for January 1, 2001. USARAK is petitioning the Army for exemption or a delay of hunter certification requirement in AR 210-21.

The current Army regulations are to ensure public safety and were not written to harass the public. The Army is able to inform the public on present closures and military activity, at the time of contact. Persons calling in, giving information on their intended general location, have been rescued in the past based on the call in information. Civilians who choose not to comply with current regulations are notified several times before action is taken to deny access.

B

telephone first to check in to go on military land, telephone immediately after you leave to say you are off. Failure to comply results in future denial, etc.... Penalties and threats are a great method of discouraging people from using military lands.

P4-71 Please quote the source of the statement, and clarify "the planned opening of the Delta Junction Closed Area by ADF&G and the Army to moose hunting would increase opportunities for harvesting moose on Fort Greely." As a member of the Delta Junction Fish and Game Advisory Committee, I can tell you that no such plan currently exists. Again, there is too much red tape for locals to deal with for extensive hunting and trapping. Locals often complain because military hunters do not even have to buy an Alaska hunting license to hunt on military land. We also realize that they take game on adjacent State land because they do not know where the boundaries actually are.

SUB-B003

SUB-B003: You are correct. This wording originally appeared in the Fort Greely *Integrated Natural Resources Management Plan* but has since been removed. Thank you for pointing this out.

Subsistence is a term that does not even receive real consideration by the military, including within this document. They do not give any form of preference to subsistence users. The only priority they give is to military personnel. I do not see that the No Action Alternative has any negative effects. Please explain them to me if I am incorrect. Reversion to the BLM is the only way a local subsistence priority could be put into effect. I know this from my membership on the Eastern Interior Federal Subsistence Advisory Council. Please do not mislead others! BLM lands are generally far more accessible to the public than are military lands.

SUB-B004

SUB-B004: Chapter 4.20 did not clearly state that access for subsistence users would improve under State as well as BLM control. The wording has been changed accordingly.

Finally, since Fort Greely no longer plans to contribute substantially to the local economy, I would prefer to see it closed completely. All neighbors should be good neighbors, and one that is completely negative is not appreciated!

SOC-B007

SOC-B007: Noted.

Nathaniel M. Good - Not Good
Nathaniel M. Good
Box 827 Delta AK 99737

I am a member of the following organizations, but am representing myself personally on this response. I wish I had the time to more completely do so!

Delta Fish & Game Advisory Committee

Eastern Interior Federal Subsistence Council

Delta Junction City Council

Gerstle River Test Site Expansion Area RAB

C

Ed Sheehan
Box 472
Delta Jct, AK 99737
907-895-4806

5 January 1999

To Whom It May Concern,

1. The following comments are submitted concerning the Alaska Army Lands Withdrawal Renewal, Draft Legislative Environmental Impact Statement (LEIS), Volumes I and II. My comments only relate to the Fort Greely, Alaska (FGA) East and West Training areas.

2. I would like to compliment the work done by Mr. Cindy Herdrich (the contractor Project Manager) and Mr. Douglas W. Johnson (the USARAK Program Manager) on the LEIS. These managers, and their teams, did a great job - this is especially true when one considers the lack of information available in some key discussion areas.

3. Up front, the LEIS Executive Summary states that conflicts of public use concerning access to the land and air space in question will not be resolved

RESPONSES TO COMMENT C

OTH-C002

OTH-C002: U.S. Army Alaska appreciates Mr. Sheehan's time and effort to provide comments and concerns throughout the preparation of this LEIS.

ACC-C005

ACC-C005: The Executive Summary states that the issue of access will not be resolved. This statement was made because the public is requesting access changes that the Army cannot implement, due to the military mission or safety factors. As you realize, the Army cannot identify specific areas on the withdrawn lands to be permanently open to public use. This would hinder military training activities and jeopardize the military mission. The Military Lands Withdrawal Act PL 99-606 Section 3.3 "Closure to Public" states "If the Secretary of the military department concerned determines that military operations, public safety, or national security require the closure to the public use of any road, trail, or other portion of the lands withdrawn by this Act, the Secretary may take such action as the Secretary determines necessary or desirable to effect and maintain such closure. Any such closure shall be limited to the minimum areas and periods which the Secretary of the military department concerned determines are required to carry out this subsection."

C

9-16

by the LEIS; yet, this issue is discussed throughout the text.¹ Public access is an obvious LEIS concern, and must be addressed. The Congressional Public Land Order (PLO) which will result from this LEIS should be specific concerning public access. Otherwise, subordinate commanders and range controllers will be making congressional policy as they close large tracts of land and air space when there is no military training or safety justification for such actions. In the immediate past, unjustified block closures of land and air space have frequently occurred in contradiction to the current PLO.

ACC-C005
cont.

4. Throughout the LEIS, increased USAF activity at FGA is obvious.² The USAF states that no new impact areas are proposed for their use.³ The Kansas, Arizona, Nevada, Oregon and Michigan Lakes Impact Areas⁴ are new dedicated impact areas which are not justified within the text of this LEIS or in the previous approved EIS.⁵ Creation of additional impact areas, and the resulting unexploded munitions, cause problems for the State of Alaska and the local community as discussed in the BRAC

USE-C005

USE-C005: This LEIS is not proposing to create new Impact Areas on Fort Greely or change the use of existing Impact Areas. The Kansas, Arizona, Nevada, Oregon, and Michigan Lakes (see Figure 2.c) are designated as Impact Areas. All are used for limited periods and are normally used for non-dud producing ammunition or explosives, which are cleared and returned to other training support purposes following termination of firing. This use of the Lakes Impact Areas will continue through the proposed withdrawal renewal.

C

testimony, and in a letter from the Community Coalition.

5. Accept for a USAF decontamination plan for the two impact areas (Delta Creek and Okemaha). ^{That} they plan to use, the LEIS does not address decontamination of the remaining impact areas (Lakes, Mississippi, or Washington). ^{As} input to a PLO that may be in effect for 50 years (almost as long as FGA has been in existence), the LEIS should address proper records keeping and unexploded munitions disposal. In my opinion, the military should declare that a total decontamination of previously fired munitions in the Delta River and Delta Creek Impact Areas is not feasible.

6. Some of responses to public comments found in the LEIS Scoping Summary are incomplete (not justified elsewhere in the text) or are arbitrary (written off as inappropriate for the LEIS). For example, the FGA Training Area West can be interpreted as closed to public access when one reads the preferred alternative of the LEIS.¹⁰ With proper

MIT-C001

MIT-C001: Please refer to the response for POL-A002.

ACC-C006

ACC-C006: The entire Fort Greely West Training Area is not closed to public access. Areas within the Training Area are listed as having permanent or limited closure. These areas are described in Chapter 3.16 and shown in Figure 3.16.b.

C

range control planning and coordination with State Departments, both the military and the public can continue to enjoy FGA Training areas as it has in the past.

7. My concerns relative to the public's use of the FGA Training Areas would be satisfied if the LEIS Executive Summary stated that the LEIS represented no major change to the current PIO, and assigns responsibility as to who in USARAK or the USAF can void the intent of the PIO or EIS in the future. Additionally, the concerns of the local community should be addressed. Paraphrased, these concerns are:

a. The environment should be considered concurrent with military training plans. Coordination with State and some Federal Agencies is frequently required.

b. No new impact areas should be used without an additional EIS submission.

USE-C006

USE-C007

OTH-C003

USE-C008

USE-C006: U.S. Army Alaska is requesting to renew the land withdrawals under the same stipulations and conditions of the Military Lands Withdrawal Act in 1986 and for the same military purposes which have been conducted over the past 15 years. This statement has been added to the Executive Summary. The renewal legislation passed by Congress will specify who has the authority to relinquish all or any of the lands withdrawn. The Military Lands Withdrawal Act specified the Secretary of the Army files a Notice of Intention to relinquish with the Secretary of the Interior.

USE-C007: Training exercises conducted on Alaska military lands are regulated by U.S. Army Alaska Range Regulation 350-2. It provides procedures for planning, requesting, and operating ranges and training areas, and highlights certain environmental aspects to be taken into consideration. This regulation is described in detail throughout various sections in Chapter 4. Specific natural resource

protection requirements include the restriction of off-road maneuvering during spring thaw (1 April to 15 May) and summer months (usually May to September) in designated creek bottoms, wetlands, and alpine areas above 2,000 feet in elevation. Vehicles are also instructed to remain on marked trails and designated routes until directed otherwise during tactical deployment.

To guide and regulate the actions of Army personnel using and managing training lands, the Army has developed the Integrated Training Area Management (ITAM) program. This program is described in detail in Appendix 2.D.

Stream crossings conducted during the winter months can only occur at designated ice bridge locations. Ice bridges are permitted to be constructed each season in the same location and each site has a specific amount of water scheduled for use. New applications for permits must be submitted to the State of Alaska when the existing permits expire or for an activity that significantly deviates from the approved permit.

Impacts to wetlands are minimized by various Army, Federal, and State laws and regulations. The Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act require permits before construction work using mechanized equipment occurs.

It is also Department of Army policy to avoid adverse impacts to existing aquatic resources and offset those adverse impacts where they are unavoidable. The Army will continue to "strive to achieve a goal of no net loss of values and functions to existing wetlands, and permit no overall net loss of wetlands on Army controlled lands" (U.S. Army Regulation 200-3, Land, Forest, and Wildlife Management).

Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical and biological resources as outlined in Chapter 4.23.

The Army is protecting sensitive wildlife species and their habitat through the Integrated Natural Resources Management Plans. Changes reflecting new management areas are identified in Chapter 3.12. The Army and Bureau of Land Management manage the resources as directed in the Military Lands Withdrawal Act PL 99-606.

The Army has completed a floristic survey of Fort Wainwright and is conducting a survey on Fort Greely. If threatened or endangered species are found, necessary protection and management will be implemented. Please refer to Chapter 4.11 Vegetation and review the Existing and Proposed Mitigation.

OTH-C003: Coordination with State and Federal agencies is occurring now through the development of the Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely, obtaining permits, and complying with Federal, State, and local laws and regulations. This will continue to occur throughout the withdrawal renewal period.

USE-C008: No new Impact Areas are being proposed in this LEIS. U.S. Army Alaska policy states that new contaminated Impact Areas will not be created on withdrawal lands without approval per Army regulations and the Bureau of Land Management (AR350-2) and applicable Federal laws, including the National Environmental Policy Act.

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c. Decontamination planning, execution and supervision should exist for all impact areas.

MIT-C002

MIT-C002: Please refer to the response for POL-A002.

d. Range control and explosive ordnance disposal (EOD) personnel should exist at FFA, or the LTIS should explain how the public safety concerns can be satisfied without these personnel.

USE-C009

USE-C009: No decision has been made on retaining Range Control and Explosive Ordnance Disposal personnel at Fort Greely after the realignment becomes final in 2001.

e. Range and terrain utilization records must be maintained and supervised.

USE-C010

USE-C010: Non-dud ammunition records are kept for an indefinite period with other range statistics. Records on dud-producing expenditures are kept permanently per Army Regulation (AR385-63). U.S. Army Alaska recognizes the inconsistencies in its record keeping on Range Use at Fort Wainwright and will correct that situation.

f. USARAK and USAF Range Use Regulations must be coordinated, and adequate to provide for military and public safety

USE-C011

USE-C011: U.S. Air Force use of U.S. Army Alaska ranges is coordinated through Interservice Support Agreements and Memorandums of Understanding. The Air Force's Range Regulations were developed in compliance with the provisions of these agreements. If additional guidance is needed, the Air Force institutes guidance through their Range Regulations.

g. Trainers must consider the potential fire hazard and coordinate with State fire managers in the local community. When necessary, potential fire hazard areas should not be fired upon. Impact areas must be reduced in size and scope so that fire fighting can be accomplished on the ground when necessary. ^{IN SET #1} With proper range control planning & coordination, impact areas can be used without causing wild fires and the destruction of flora and fauna.

FIRE-C002

FIRE-C002: U.S. Army Alaska Range Control offices and fire departments, with input from the Bureau of Land Management, Alaska Fire Service (AFS), have developed a Fire Prevention System based on the Canadian Forest Fire Danger Rating System (CFFDRS). The Army and the Air Force follow fire indices and stops the use of pyrotechnics, during periods of high fire danger. The Army also ceases live firing during high hazard periods. Each Impact Area is managed according to its fire hazard. Impact Areas are not proposed to be reduced in size.

C

8. Members of the Department of Defense, Department of the Interior and Congressional Staffs, who will ultimately formalize the PLO, should consider the following which is not well understood by reading the LEIS:

a. The Delta River which marks the eastern most boundary of the FGA Training Area West is a major river obstacle. Ground access is usually difficult, but less so from ^{about} 15 November until 15 March when the river is frozen."

b. The boundaries of the FGA Training Area West, and its impact areas, have not been surveyed, fenced or marked.

9. As a result of the BRAC decision to downsize FGA, as currently planned, all of the military and civilian personnel spaces needed to support live firing at FGA will be deleted. An area as large as New Jersey will be void of normal emergency services which is now provided or assisted by FGA personnel.¹² After the BRAC, FGA will continue to be a major military simulated and live fire training area, but without any on-site supervision. Many of us believe this is a disaster waiting to happen.

Signature

INSERT #1

The impact areas located in the Delta River and Delta Creek are composed primarily of silt and gravel, and do not present the same fire hazard as the remaining wooded impact areas.

REFERENCE INDEX

ITEM		
ISR		PAGE(S)
1	ES.10, 4-16-12, 4.60+61	SCP 58-72
2	2.17-20	
3	SCP. 48	
4	2.29 2.6	
5	2.11-25	
6	SCP 57-59	
7	2.25-26	
8	SCP. 68-72	4.60-61
9	SCP 1-105	4.60-61
10	4.60-61	
11	2.39	
12	2.70	

OTH-C004

OTH-C005

USE-C012

OTH C004: Stream freezing and low flows are discussed extensively for the withdrawal area water bodies in Chapter 3.8.1.3 *Low Flow/Aufeis*. An additional statement describing the Delta River was added to Chapter 2.1.3 Preferred Alternative under the section heading Fort Greely West and East Training Areas Army Facilities.

OTH-C005: A legal boundary description and property history for Fort Greely are in Appendix 1.A of the LEIS. The legal boundaries were published in the Federal Register. See Appendix 1.A for the legal descriptions. No surveys of the Fort Greely boundary have been completed and are not required.

Army Regulation 385-63 requires marking range boundaries every 200 meters. A waiver for Fort Greely concerning this regulation is on file at the Directorate of Plans, Training, Security, and Mobilization at Fort Richardson. The cost of placing signs every 200 meters around the Impact Areas is estimated to cost millions of dollars. Fort Greely Range Control announces temporary closures and areas that are off-limits permanently via weekly radio announcements. Please review Figure 3.16.b for locations of access restriction signs and gates.

USE-C012: Noted. NEPA documents, including Environmental Assessments, are being prepared to analyze the impacts of the realignment on Fort Wainwright and Fort Greely. The Environmental Assessment for Realignment of Personnel and Military Functions to Fort Wainwright was published in June 1997. It is anticipated the Environmental Assessment for Realignment of Personnel and Military Functions from Fort Greely will be published in October 1999.

No decision has been made on retaining Range Control and Explosive Ordnance Disposal personnel at Fort Greely after the realignment becomes final in 2001.

D

U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL
ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 1/5/99

COMMENTOR'S NAME: Fronty Parker

COMMENTOR'S ADDRESS: P.O. Box 605

Delta Tel. AK.

COMMENTOR REPRESENTING: SELF: ☐ ORGANIZATION: ☒

ORGANIZATION

NAME: ADF&G - Sport Fish Division

ADDRESS: Same as ARLVP

COMMENTS: RE: ICE BRIDGES

Inquire about types of subsurface studies if any
That affect groundwater table, I was directed
to Cold weather test section people at Fort Rich.
There is a need to know what disturbance if any
occurs ~~under~~ below surface of ice, IF A ice sill is
formed ^{it so} ~~not~~ what impact that may cause. ~~Also ~~substantiated~~~~
~~in lands~~ I wanted to encourage cooperation between
Army & ADF&G to maintain/enhance fishing opportunities
on military lands.

WATER-D002

FISH-D002

RESPONSES TO COMMENT D

WATER-D002: The Alaska Department of Fish and Game and the Cold Regions Research and Engineering Laboratory (CRREL) are in the early stages of developing a study matrix. CRREL and the Army are evaluating study proposals for assessing the impacts of ice bridges on groundwater.

FISH-D002: Maintaining and enhancing fishing opportunities are discussed in Chapter 4.13 under the Preferred Alternative and Proposed Mitigation. Proposed Mitigation states that fishing opportunities for the public will be maintained, habitat for stocked fish will be improved, and wild fisheries habitat surveys will be conducted.

Army seeks 50-year extension of land withdrawals

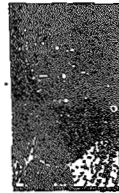
Military land withdrawals covering 871,537 acres of Interior Alaska expire in less than three years, and the U.S. Army is quietly asking Congress to renew them for 50 years, three times longer than the current withdrawal terms.

There are three withdrawals involved. The Fort Wainwright Yukon Training Area covers 247,952 acres east of Eielson Air Force Base in the uplands between the Chena and Salcha rivers. The Fort Greely East and West training areas straddle the Richardson Highway in the Donnelly Dome area south of Fort Greely, and together cover another 623,585 acres.

The land was dedicated for military training maneuvers during the 1950s in a flurry of federal land grabs that preceded Alaska becoming a state.

After 1958 Congress required that it approve any withdrawal of more than 5,000 acres. In 1961 Congress authorized the Yukon Training Area withdrawal for only a 10-year term. That was extended by a public land order for an additional five years in 1971, and by a bureaucratic shuffle for another 10 years after that expired.

Fred Pratt



Congress renewed the withdrawal in 1986 for only a 15-year term. At that time the Army turned loose 1,900 acres that is now part of the Chena River State Recreation Area.

Now the Army wants the land for a 50-year term, and its contractor just finished the draft of an environmental impact statement advising Congress and the public of the issues surrounding the decision.

A public hearing is scheduled on the EIS in Fairbanks Jan. 6, from 2 to 8 p.m. at the Carlson Center. Other hearings are set for Delta Junction on Jan. 6 (same hours, at the Diamond Willow Club) and in Anchorage Jan. 7.

There are a lot of potential public concerns about the continuing withdrawals that the Army hopes don't come up.

The Yukon Training Area

covers a huge region near Fairbanks with an enormous potential for mineral development, recreational use and timber sales. It's covered with roads and trails, it adjoins Chena River State Recreation Area and even includes 13,440 acres of the park that the Army refuses to transfer to the state. The trans-Alaska pipeline right of way crosses one corner.

The military training areas are open to hunting, fishing, trapping and other recreational uses now, but are often closed during maneuvers and some "impact zones" used for artillery and aerial bombardments and surrounding "buffer zones" are permanently closed. The airspace over the training areas is also closed to an altitude of 20,000 feet during maneuvers.

The state of Alaska has filed land selections on parts of the Yukon Training Area, hoping to acquire the land if the withdrawals should ever expire.

Of course much of the land is covered with hazardous materials and unexploded "dud" warheads. The U.S. Army Corps of Engineers estimates that it would cost \$47.4 million to clean up the Stuart Creek Impact Area in the Yukon Training Area. The total

bill for cleaning up all three training areas is estimated at \$249.9 million.

The EIS warns that federal agencies might just declare the land too polluted to release and it might not be declared available for state selection even if the withdrawals expire. The key state selections avoid these heavily polluted impact areas, however.

The EIS considers only two options: Letting the withdrawals expire or extending them for 50 years. The EIS team in Colorado rejected any shorter term, as well as the request from the state that the tiny portion on the northeast border be transferred to the Chena River Recreation Area.

The EIS is prepared by the Center for Ecological Management of Military Lands at Colorado State University. This organization acts like it or its clients in U.S. Army Alaska should never have to commit to anything on paper when dealing with the public until and unless it is legally required to do so.

The EIS and the required public hearings were announced in small display advertisements run in the Daily News-Miner this month. The ad gives no physical location for places to get a copy of

the document, but simply states that for further information one should call a Steve Reidsma at Fort Wainwright, and it lists what turns out to be a bogus phone number.

I called the Fort Wainwright information operator and was told Mr. Reidsma wasn't on their list of personnel. I was transferred to the base personnel office, where I was told that there was no civilian employee on Fort Wainwright with that name either.

After transposing one number listed in the ad I got Mr. Reidsma's phone answering machine. We connected a few days later and I finally got a copy of the EIS in the mail two weeks after my initial attempt. Even though I informed them about the incorrect contact phone number in the newspaper advertisement, it continued to be published. The correct phone number is 353-9685.

Any operation that goes to these lengths to stall and divert the public can't be doing an honest job on the EIS.

Fred Pratt, a free-lance journalist in Fairbanks, is a longtime reporter and observer of Alaska politics.

MIN-E002

ALT-E006

REC-E002

FOR-E001

ALT-E005

RESPONSES TO COMMENT E

MIN-E002: It is noted that some mineral potential exists. See Chapter 3.5 Mineral Resources.

REC-E002: The Fort Wainwright Yukon Training Area covers approximately 247,952 acres. The Beaver Creek-South Fork Area is approximately 13,440 acres. In 1975 the Alaska State Legislature designated the boundaries of the Chena River State Recreation Area, which includes a portion of Yukon Training Area land referred to as the Beaver Creek-South Fork Area. This State action did not transfer title of the land nor was it supported by Federal agencies. The Army and Air Force considered an alternative to relinquish this portion of the Yukon Training Area (see Chapter 2.3.3) to Alaska State Parks, but eliminated it from further study due to the excessive impacts to military training and the importance of this area's training infrastructure in achieving combat readiness. The State of Alaska has not identified this land as high priority for conveyance to the State.

FOR-E001: The Army plans to implement a project to inventory forest resources on Fort Wainwright and Fort Greely, and develop a forest ecosystem management plan. The study would identify potential timber harvest areas and the feasibility of timber sales. The Bureau of Land Management (BLM) controls timber rights on the withdrawal lands under Public Law 99-606. Any timber harvesting would require the efforts of U.S. Army Alaska and the BLM.

ALT-E005: Military use of the Yukon Training Area started in 1956. In 1975 the Alaska State Legislature designated the boundaries of the Chena River State Recreation Area, which includes a portion of Yukon Training Area land referred to as the Beaver Creek-South Fork Area. This State action did not transfer title of the land nor was it supported by Federal Agencies. The Army and Air Force considered an alternative to relinquish this portion of the Yukon Training Area (see Chapter 2.3.3) to Alaska State Parks, but eliminated it from further study due to the excessive impacts to military training and the importance of this area's training infrastructure in achieving combat readiness.

ALT-E006: The Army and Air Force developed the Preferred Alternative and determined other alternatives to be analyzed in the Draft LEIS based on military operational parameters and training needs (see Chapter 2.1). The Army and Air Force eliminated alternatives from further consideration if they impaired their ability to complete their missions in Alaska (see Chapter 2.3). The Center for Ecological Management of Military Lands analyzed the viable alternatives as determined by the Army and Air Force.

Alaska: the great bombing range

Military proposal needs closer look

What would you say if the military proposed to shoot 3,500 rockets packed with high explosives into a drainage of the Chena River upstream from the state recreation area? What would you say if, at the same location, they also wanted to drop 4,300 bombs each weighing up to a ton? And, on top of all that, shoot off 50,000 additional high explosives?

Would you wonder if these munitions can contaminate the soil? (They can). Would you ask if the contamination can spread to surface and ground water? (It can). Would you be concerned about unexploded rockets and bombs lying out in the brush or burrowed into the soil? (You should).

The fact is, the bombing statistics quoted above are not what the military is proposing to do. It is what the military already has done in just five years at the Stuart Creek Impact Area which includes the South Fork of the Chena River. A similar list of bombs and rockets and missiles have been sot into the countryside along the Delta River adjacent to Ft. Greely in the last few years, according to a Draft Legislative Environmental Impact Statement (LEIS) just released by the Army.

The document was produced in support of the Army's proposal to continue using the two areas, totaling 1,300 square miles of Alaska land, as bombing ranges. Another million or so acres of the Tanana Flats is also used as a bombing range, but it is not part of this application. In the past, these renewals have been for 5-15 years, but now the Army wants to be permitted to continue bombing for 50 years.

What effect are all these exploding bombs, rockets and missiles—or nonexploding duds—

Dan O'Neill



likely to have on soil and water quality in the Chena basin or the Delta River? The military doesn't know. They haven't conducted soil contamination studies there. What is known is this. TNT and RDX, the dominant explosives used, are mobile in the soil, and "residues of these chemicals in the soils can be a source of pollution both on Army installations and beyond installation boundaries." Presumably the more-than-residual contents of a cracked open dud can be a source of pollution as well. Streams crossing the bombing zone are likely to be the transport mechanism to carry contamination off-site. The possible risk to people, animals and plants is not addressed.

* Very likely, chemical contamination of soil and water is a non-issue compared to the effect of dud munitions. It is virtually impossible to find all the duds, and the military estimates it would cost \$250 billion to clean up these two bombing ranges. Besides risks to people and animals, wildfires are a frequent result of these duds or flares or pyrotechnic ordnance. Even if dropped in the winter, they can reignite themselves when the snow melts. Often, these fires cannot be fought because of the risk to firefighters of exploding duds.

Obviously, the military has to train somewhere. But there is a lot to question here. Why, for example, is it necessary to drop live bombs and rockets when aerodynamically-alike dummies—which the military also uses—provide the same training? Shouldn't live munitions be dropped in more

barren locales so that unexploded ones can be removed? Instead, a tremendous quantity of live ordnance lies hidden in the brush, making thousands of square miles of Alaska countryside a no-man's land. Permanently.

Consider the testimony of Ed Sheehan, a retired Lt. Colonel who has been associated with Ft. Greely for 38 years and has had indirect authority over the bombing range activities there. He spoke at two public meetings on this issue a year ago and his comments are part of the public record. Concerning removing all the duds from the Delta River, which is routinely bombed directly, he said, "I would say you can never clean up the Delta River, which is one of the big impact areas, and you can never clean up the Little Delta Creek."

At another point he said, "There are more duds in the Delta River than there are in the Oklahoma Range (part of the Ft. Greely complex). And I'm telling you that in all of the '60s and early '70s the Air Force used Oklahoma as much as they are using it right now. It was a steady thing. And they didn't pick up the duds before they left. This dud picking up business started about '82. Before that, they used to send statements, certificates that said there were no duds, or all the duds were cleaned up."

Sheehan, who has served as acting post commander at Greely, also made very plain his objection that this renewal application enlarges the impact areas. He was mainly concerned about the fire danger to residents around the town of Delta. But he says the Army is labeling all of the country between the Delta River and the Oklahoma Range an "impact area," though it had not been a bombing range in the past. Rather, it had been used as a maneuvering area or a buffer zone. When the current range manager assured him that he did

not regard the designation as a change, that "it's already a bombing area now. I mean it can be bombed," the Lt. Colonel replied: "It is not now and has never been a bombing area... I ran range control for 17 years... I drew those boundaries. I know what's supposed to be done there... if you're going to use it, tell us you're going to use it. If you're not going to use it, tell them they can't use it."

The Army's LEIS is not particularly forthcoming in its history section, either. Unmentioned is the fact that at Ft. Greely's Gerstle River Test Site the army once experimented with some of the most deadly chemical agents known to man. Several authors have tracked military use of the lethal nerve gases VX and VG, as well as mustard gas being packed into rockets and artillery shells and fired into the Gerstle River area. At Delta Creek the army also released germ-warfare organisms into the environment, including strains of the tularemia bacteria. The point is, if we intend to learn from history, we will be more than a little circumspect when we review military proposals that request to bomb our public lands for the next half a century.

Do the people of Alaska agree with Sen. Stevens when he says he wants to make Alaska the military training capital of the world, with foreign air forces invited to bomb our landscapes? Are we so dependent on military subsidy that we would sell our birthright for it? Wouldn't federal money be better spent cleaning up the mess the military has already made?

The advertised "public hearing," which is really an "open house," on the proposed 50-year extension of bombing ranges will be Jan. 5 at the Diamond Willow Club in Delta Junction from 2-8 p.m., a second takes place Jan. 6 at the Carlson Center from 2-6 p.m.

RESPONSES TO COMMENT F

USE-F013: Training ordnance is used extensively by the military. Most bombing by the Air Force on the withdrawal lands is with training bombs (see Tables 2.i and 2.j). The experience of training with live ordnance is a necessary requirement for combat readiness. Expending live ordnance tests and evaluates both logistical and operational training programs. It tests and analyzes all necessary steps of an ordnance system to ensure its effectiveness during combat. As with all simulated military training, the more realistic the training, the better our forces are trained for combat.

USE-F014: Acquiring other public lands in Alaska for military training and testing facilities would be cost prohibitive even if the necessary acreage was available. It seems unreasonable and impractical to relocate military training to other public lands and commit resources at these alternate sites as High Hazard Impact Areas without the technology to completely decontaminate an Impact Area at an economically feasible cost. It is also cost prohibitive for the military to deploy units to other locations for training. Also see Mr. O'Neill's two other comment letters, H and T in this section.

USE-F013

USE-F014

PUBLIC COMMENTS REGARDING
THE DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT
STATEMENT
ALASKA ARMY LANDS WITHDRAWAL RENEWAL
U.S. ARMY ALASKA
DEPARTMENT OF THE ARMY

Proceedings Held at
The Carlson Center
Pioneer Room
Fairbanks, Alaska

HEARING PROCEEDINGS HELD ON
Wednesday, January 6, 1999

Volume 1 of 1
Pages 1 to 15, inclusive

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

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P R O C E E D I N G S

(The following is the statement by
Mr. Robert Layne from the State
of Alaska, Division of Natural
Resources, Division of Land, given
at 2:58 p.m., January 6, 1999.)

MR. ROBERT LAYNE: I guess I should begin by
saying I already gave you a deposition back the last time
you had meetings in December of — I think of last year
for our division. And our primary interest in what's
going on here with this renewal, it's Ft. Greely that
we're primarily interested in right now. The ownership
of the Delta River is something that the State of Alaska
claims through the Statehood Act and Submerged Lands Act,
and we believe that we have ownership of that corridor as
it runs through Ft. Greely as a navigable waterway.

And it's our concern that the activities that

RESPONSES TO COMMENT G

LAND-G001: The State of Alaska, Department of Natural Resources, Division of Land has indicated interest in the Delta River, including an ownership interest in the lands submerged under the high mean water mark of the Delta River. The United States Army Alaska is reviewing the Division of Land's ownership claim.

LAND-G001

Please refer to Executive Summary and Chapter 1.8. Additional information regarding water quality and the jurisdiction of submerged lands has been added to these sections. Chapters 3.1.1 and 4.1 describe submerged lands and their relation to land use. A reference to current issues has been added to Chapter 4.1. Chapter 4.8.2 describes the issue relating to water quality, monitoring, and decontamination of submerged lands.

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have been going on there over the last 50 years and are ongoing are potential public safety and health hazards. And we are — would like to see some — basically, you know, that some of these things are at least looked into, and ultimately that we would like to have the corridor cleaned up and made safe.

The reason that I say that we believe that we

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own that is because Statehood occurred in 1959. This land was not withdrawn to the public domain to Ft. Greely until 1961, two years later. So we feel we have a solid position on that.

And we have no — there's a high incidence of cancer and other problems in the Delta area that may or may not be associated with some of these activities. And the fact that the waterway is navigable is important in that if there are unexploded ordinance or dangerous chemicals out there, that they are accessible to the public, as the river corridor is at nearly all times.

And also to the wildlife that inhabits that corridor. And those things that they pick up, the wildlife, who spend most of the time out there, are ingested by the local populations, and others; and so therefore, those things can be carried into the system that affects humans as well as animals.

So we, you know, we are trying to work with the military. We have sent them some correspondence to the effect that we own the land and that we would like to see it cleaned up and that we would like to have some control over what goes on there.

And to date, we haven't received a very positive response to our requests. But we're still working with that. We're still willing to work with the military in

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any ongoing negotiations. But as we consider locking this land into another 50 years of this kind of use, which basically equals the entire time it's been used, we have some major concerns about how this is going to influence not only that particular corridor that runs through Greely, but that which is influenced by it downstream. And those are very important things.

We have population centers there and we have some of our most important salmon spawning grounds

POL-G004

POL-G004: The State Epidemiologist was not aware nor had information relating to a high incidence of cancer in the Delta area. The Tumor Registrar at Fairbanks Memorial Hospital indicated the incidence of cancer at Delta Junction is not abnormal nor statistically significant compared to the Northern Region of the State of Alaska (1997 most current data available) (Pam Peters, pers com. 1999).

Recent surface water quality surveys have not been completed for the withdrawal lands by the military or any other State or Federal entity. The most recent water quality investigation of Fort Greely was a baseline study conducted by the U.S. Environmental Hygiene Agency in 1990 to determine if munitions fired into the Impact Areas were having any adverse effect on water and sediment quality. No explosives were detected in the water samples and the data indicated the stream chemistries were not adversely affected by munitions. Please refer to Chapter 4.8.2 *Water Quality, Munitions* and Appendix 3.8.D for further information.

Prior to this study, water samples were collected from the Delta River above Jarvis Creek near Fort Greely by the U.S. Geological Survey in 1986 (See Appendix 3.8.D). All analyzed munitions values were below detectable limits. No other water samples collected within the withdrawal areas were analyzed for munitions.

Please refer to responses for POL-A001 and POL-A002. Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

FISH-G003

FISH-G003: Please review response POL-A001 and the mitigation for Pollution in Chapter 4.23. The proposed mitigation for wild fisheries found in Chapter 4.13.2 states that wild fisheries habitat surveys will be conducted.

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downstream in there, and so the things that are going into the waters and influencing those areas are of concern to us. That's about it.

Also, the Delta River, the Little Delta River and all these tributaries that come into the Tanana there, where they come into the Tanana is some of the most important spawning ground within the interior of Alaska. That whole part of it.

And so obviously, whatever goes into the water there is going downstream and can — if it's in solution, it could be picked up by the fish; and if it gets into the sediments, it can be picked up by the fish. So those are some side issues to the issues that were already there, you know, from public safety involved with unexploded ordinances.

Also, it's my — I'm given to understand that

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there are a number of landfills that have been put into the Delta River corridor over time, which, as the river changes and conditions change, may or may not be exposed and carried downstream to further influence this. So these are also concerns about what's going on.

(Statement concluded at 3:03 p.m.,
January 6, 1999.)

(The following is the statement given
by Christine Storey at 3:57 p.m.,
January 6, 1999.)

MS. CHRISTINE STOREY: My comments are mainly with the Chena River recreation area, Chena Hot Springs Road. And I would like the Army to give more consideration to giving that land back to the state so it can be used for the park. I think the Army has enough land elsewhere. That's it.

(Statement concluded at 3:58 p.m.,
January 6, 1999.)

(The following is the statement given
by Mark Backes at 4:24 p.m.,
January 6, 1999.)

MR. BACKES: Opening statement, huh. Oh, man. Well, gosh. I think the military should put the land back to the people. For one, I think they are polluting the land, and their cleanup efforts are poor, unless they

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are forced to actually clean up. And so for sure, they

FISH-G003
cont.

POL-G005

POL-G005: The Army received a permit from February 1, 1984 to November 1988 to operate a landfill at the edge of the Delta Creek Assault Strip, which is located in the floodplain of Delta Creek. All combustibles were burned prior to burial. The landfill was primarily used for training debris disposal, including human waste, packaging, and daily use items during large training exercises. Targets are placed on gravel bars no less than 50 feet from flowing water in the Delta River and Delta Creek. During clean-up, debris is removed from the riverbeds and not buried within the floodplain.

The only items that are placed within the Delta River corridor are those related to targetry, which include items constructed to resemble helicopters, aircraft, hangars, tanks, bunkers, armored personnel carriers, and vehicles. They are constructed of plywood, steel drums, concrete, or salvaged metal vehicles. Clearance of Air Force targets on the Stuart Creek and Oklahoma/Delta Creek Impact Areas are conducted on an "as needed" basis during annual decontamination operations.

ALT-G007

ALT-G007: Noted. Military use of the Yukon Training Area started in 1956. In 1975 the Alaska State Legislature designated the boundaries of the Chena River State Recreation Area, which includes a portion of Yukon Training Area land referred to as the Beaver Creek-South Fork Area. This State action did not transfer title of the land nor was it supported by Federal agencies. The Army and Air Force considered an alternative to relinquish this portion of the Yukon Training Area (see Chapter 2.3.3) to Alaska State Parks, but eliminated it from further study due to the excessive impacts to military training and the importance of this area's training infrastructure in achieving combat readiness.

ALT-G008

ALT-G008: Noted. Routine decontamination operations by the Air Force are defined in Chapter 2.1.3.

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should clean up before they mess up any more. And I think they should have a yearly cleanup problem — or process, rather than let it get so bad they can't afford to do it and don't want to let it go back because it's too messed up.

I think access to the land, I think it's very — very important for people of Alaska because our recreational use and hunting and fishing is limited by the access, and when you have large — large areas like these, these areas that are nonaccessible, it's pretty remote, I guess, to use the stuff, I mean.

And as far as, you know, if there would be, you know, if these lands would turn back to the state and possibly the military people would, you know, have to relocate and that, you know, they are — I kind of see a little bit of problem there because they are saying that they put a lot of money into the government, but they also take a lot of resources out of the government.

For one, they take the Permanent Fund with them, which is a lot of money. And they have ways of taking it with them when they leave. And I don't think that's really fair. I don't think they even personally deserve to even get the Permanent Fund. They are getting paid extra money to live here, they are getting their travel

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paid to get here, they are getting their housing, they are getting moved at expense to the government, and plus they are getting the Fund. And I think if that's the case, I don't think people that are getting paid to be here, COLA and whatever, that's — that should be enough.

They are not considered a resident, I don't believe, because they are not here on their own will. They are here because of their job. And someone is paying their way. So I think it's a little — it's a little corrupt.

And as far as the Air Force, I think the Air Force are a pretty good group of people, but I think all in all, the Army is a poorer class of people and I think they cost us, the government, a lot of money, just because you have to police them more. And they do cause trouble in town, surrounding areas.

They do have a pretty bad reputation, the Army boys do, out in the woods, too, for not taking care of things. And maybe they learned from the government themselves because the government's pretty wasteful and

MIT-G003

MIT-G003: Please refer to the response for POL-A002.

ACC-G007

ACC-G007: The use of the withdrawal lands by the Army does limit access for recreational activities. The Army permanently restricts access to approximately 9% of the withdrawal lands, leaving approximately 91% available to public access. Please refer to Chapter 3.16 for more information on access.

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trashes the country, and maybe that's where they get their ideas from, but not all. But I mean, there are a few and that makes it bad for everybody. And it's kind of like everything in life.

So, I guess I would like to see the land come

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back to the state. I would like to see it cleaned up, for sure. Even if they don't decide to put it back in the state's hands, it should get cleaned up. And then start from square one again.

And you know, they are trying to be nice to the people now. You know, they are forgiving people for having cabins on their land and trespassing right at this point, but you know, what will it be next year? On a 50-year lease, everything could change, they get a new commander or something.

So if they are going to let the people use it now, you know, then that should be in writing so they can use it for the next — for the duration of the lease, or contract, however they work. I don't know.

ALT-G009

I don't think I have anything else to say.

THE REPORTER: Thank you very much.

(Statement concluded at 4:28 p.m.,

January 6, 1999.)

(The following is the statement given by

Mr. Andy Montoya at 4:36 p.m.,

January 6, 1999.)

MR. ANDY MONTOKYA: I just don't approve. I don't understand why they are taking the cabins away. You know. We've had them forever. And now that they are changing their ways, we are losing our playground.

ACC-G008

ALT-G009 and ACC-G008: Under the Military Lands Withdrawal Act, the military lands are withdrawn from all forms of appropriation under the public land laws, except where the land is subject to valid existing rights. Trespass structures constructed on the withdrawal lands are illegal. U.S. Army Alaska does not authorize trespass structures on its lands.

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Places we go, we go out and stay a week at times.

I just don't understand why they are doing that. Because it's unusable land unless you have got a snow machine or an air boat. The military can't use it. You know. They are — people aren't going to walk around out there. I just wonder why.

I don't have a lot to say, other than, you know, I just wanted to find out if they were going to leave the cabins or not. But I guess not, huh?

I'm pretty much done, I believe. I don't like to see what they are doing to our playground.

(Statement concluded at 4:38 p.m.,

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January 6, 1999.)

(The following is the statement given by
John Balko at 7:16 p.m., January 6, 1999.)

MR. JOHN BALKO: You guys are leaving in 40 minutes and I haven't read this since it came out a week ago. I'm just concerned about all these unexploded munitions and exploded munitions, what kind of affect we are going to have on the ground water.

You two being female, the child bearing species, I mean, you should be more concerned about this than I am. Because you should be. Children, pregnant women, elderly. All this is upstream, it's only going to come downstream. There's no other choice.

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What surveys have been done for ground water? For streams, rivers. I mean, all this is upstream from our water supply.

And I would just like to make comment that before we go, granting the military another 50 years, another year to go drop additional bombs, futuristic weapons, what are they going to contain? Before we go lease this out, you know, maybe we should make studies and see what effect this is having.

I understand there's already a study for Ft. Greely — or correction, I'm sorry, the Delta area, saying that the residents there have a higher cancer rate than the rest of the State of Alaska. Is there a connection? Is there a connection between the bombing range there and the Delta area and what's upstream from Fairbanks? I think we need to look at this before we go blindly rushing into just blindly giving the military another 50 years.

Granted, we need a strong military, I think we need to have a place for them to practice their bombing runs, but at the same time, we need to look out for ourselves and for our children. That's all.

(Off record, then back on record.)

MR. JOHN BALKO: No, that's not all. Keep on going.

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Having just spent 20 years in the Navy, based all over the Lower 48, I've seen the results of blindly rushing in for housing developments, with a clear-cut of

WATER-G003

WATER-G003: Very limited information is available which describes the quantity and quality of the groundwater that underlies the withdrawal areas. No groundwater wells have been drilled in the vicinity of either Stuart Creek or Oklahoma/Delta Creek Impact Areas. Samples collected at various wells near the withdrawal areas, as listed in Appendix 3.9.A, were not analyzed for munitions. Thus, the effect of munitions on groundwater is unknown for the withdrawal areas.

Mitigation has been proposed to review existing groundwater quality and quantity data to determine the scope of a future groundwater monitoring network. Please refer to Chapter 4.9.2 and Chapter 4.23.

POL-G006

POL-G006: The State Epidemiologist was not aware nor had information relating to a high incidence of cancer in the Delta area. The Tumor Registrar at Fairbanks Memorial Hospital indicated the incidence of cancer at Delta Junction is not abnormal nor statistically significant compared to the Northern Region of the State of Alaska (1997 most current data available) (Pam Peters, pers com. 1999).

Although it is impossible to predict what future military operations or weapons will involve, current trends in warfare have moved toward a highly mobile air and ground force supported by massive firepower capable of attacking over much wider and deeper areas. The increased range, speed, and firepower inherent in combat units equipped with modern weapon systems have increased the need for maneuver acreage.

Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources (see Chapter 4.23).

OTH-G006

OTH-G006: Noted. Refer to Chapter 4.23 for existing and proposed mitigation. Thank you for your concern.

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every tree, and the effects this has between — between slapping additional students in overcrowded schools, roads that weren't meant to handle an additional 200 family units in the small area.

Before we go blindly rushing into unstudied or unevaluated growth, you know, maybe we should look at this as the bombing range also. Before we go blindly giving this land over for another 50 years, it just doesn't make sense if we do this without considering our health. That's all.

(Statement concluded at 7:19 p.m.,
January 6, 1999.)

(The following is the statement given
by Hugh Fate at 7:41 p.m., January 6,
1999.)

MR. HUGH FATE: By and large, we are very fortunate to have the military presence in Alaska. They are good neighbors, but there are some caveats here.

One is the request for renewal of lands expanding 50 years. I am not secure in the feeling that a 50-year lease of lands that are taken out of circulation, basically, at the same time that the

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population of Alaska is expanding is a good thing for the State of Alaska, nor is it a good thing for the people who like to recreate in the wilderness. As more people come in, the less wilderness there is to enjoy one's self in, and at the same time, the pressure on any of these withdrawals would increase, possibly mandating the military to close its borders.

As I see it, in particular, the Ft. Greely west area is important for our Cope Thunder Air Force and the MOAs, but the MOAs cover only a very small military withdrawal. Airspace is one thing, but securing topography is an entirely different thing.

And we see this again as an example in — in Ft. Greely west withdrawal, where there are several lakes and several areas that are tremendous for recreation and hunting that are within the withdrawal that really shouldn't be.

That withdrawal extends so far to the west, and I'm sorry we don't have a map to show it here to describe it, but they have a line drawn across, for example, a

ALT-G010

ALT-G010: Noted. The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ACC-G009

ACC-G009: A legal boundary description and property history for Fort Greely are in Appendix 1.A of the Draft Environmental Impact Statement. The legal boundary was published in the Federal Register. A legal description of the lands withdrawn, and maps showing the boundaries of these lands, were filed with the Committee on Energy and Natural Resources of the United States Senate and the Committee on Interior and Insular Affairs of the United States House of Representatives. The northwest boundary of Fort Greely West Training Area does divide Koole Lake and South Koole Lake into Army withdrawal land and State property. The Army does not deny access to the lakes from the State side of the lakes or from the Winter Trail access to the lakes. Please refer to Chapter 4.16 and 4.17.

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little lake called Coo Lake that people like to go and fish in, and it bisects the lake. So on the north side is the state land, on the south side is the military land. They couldn't even follow the contour of the lake, allowing the people to recreate uninhibitedly on the

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entire lake.

These are things that should be looked at. And to pursue this withdrawal in the face of these conflicts for another 50 years flies in the face of good judgment and common sense. So these are basically the things that should be looked at.

And once again, I want to emphasize that we do need a certain amount of military withdrawal up here. They have been good neighbors, we want to continue to be good neighbors, but we want to look at this very, very closely, instead of just making a carte blanche withdrawal for the next 50 years based upon what has happened in the preceding 50 years. End of statement.

Oh, you might also mention in this, if you will, that I am the co-trustee of the Birch Lake town site. There's a federal trustee and there's a civilian trustee. One is in Anchorage. And this was set up during the period when the township was formed at the time when Birch Lake was sought after by the military. The entire eastern side of Birch Lake at one time was sought after by the military.

And so from personal experience, we know what can really happen. We prevailed, the civilian people who had property, even though it was not proven up on, it was kind of squatted on or homesteaded up on, they had the

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opportunity to buy their property after the town site was formed, which they did, and the town site exists today.

And there was funds put in this town site for not only improvement for the town site, but certain things that were required by the federal government to meet certain standards. There's still money in that fund, and this is why I'm the trustee there. There's a federal and another person who is a resident — not resident, but a property owner at the town site.

We're concerned because so many people from our little town site go over and recreate in these areas,

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plus the fact that we've had the experience of these supposed takeovers from the military. So we are sensitive to it. Second end of second statement.

(Statement concluded at 7:47 p.m.,

January 6, 1999.)

(No further statements were given on

January 6, 1999.)

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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 proceedings, the various statements, taken January 6, 1999, 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 _____, 1999.

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

My Commission Expires: February 15, 2002

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H

DAN O'NEILL
2590 HOME RUN
FAIRBANKS, ALASKA 99709
PH. & FAX: 907/479-2988

January 6, 1999

TO WHOM IT MAY CONCERN:

The following comments are offered on the US Army's
Alaska Army Lands Withdrawal renewal:
Draft Legislative Environmental Impact Statement:

Retired Lieutenant Colonel Ed Sheehan gave written and oral comments on this topic for the record at several public meetings a year ago. Mr. Sheehan was the former Acting Post Commander and the former head of the Army's Northern Warfare Training Center. During his 38-year association with Ft. Greely, he had indirect authority over bombing range activities for 17 years.

Many of the comments Sheehan made were ignored completely in the LEIS. Others were not adequately addressed in the minimal and formulaic responses in the "Response/Reference" section of the LEIS (p. SCP-1). Generally, the response simply referenced a section of the report where generic EIS verbiage could be found. Sheehan's comments deal with serious issues presented by perhaps the person most qualified to comment on the Army's bombing activities. They *require* a straightforward, point-by-point response.

If Sheehan's comments are accurate, it seems unwise to extend the military's occupation of this public land for next half century. Obviously, if this EIS is to achieve any credibility, it must respond honestly to these comments:

1. Is it true as Sheehan says that "there's been more destruction in the past 15 years than has been done in the history of that land, rivers, or what have you. I can bring you around, anybody can bring you around and show you this. Mass destruction, needless destruction....And most of it is done with total disregard of existing EIS's..."? (LEIS p. SCP-81)
2. Is it true, as Sheehan says, that there have been "all manner of live fire blunders including numerous violation of Ft. Greely environmental statement..."? (LEIS p. SCP-83)
3. Is it true as Sheehan says that there are safety problems in the Delta River Impact Area when airplanes use laser-equipped ordnance: "I would like to have anyone show me how the Army...or the Air Force...can fire a laser from an aerial platform while flying or shooting north-south or south-north, and still meet DOD safety requirements. It can't be done"? (LEIS p. SCP-84)
4. Is it true as Sheehan says that these lasers can create a public safety problem due to "refraction and reflection, and ricochet problems with tungsten carbide cores and spent uranium cores, you have to be very, very careful to keep that stuff on post. And you all know as I know that

RESPONSES TO COMMENT H

USE-H015: The destruction on the ranges has occurred at the same rate and it is cumulative. Approximately four years ago, the Army adopted a four part approach to reversing the destruction. The program is called Integrated Training Area Management (ITAM). Scientific data is collected on the extent of the damage, mitigation measures are implemented, training schedules are modified, and troops are educated on maneuver damage avoidance. (See Appendix 2.D for a detailed discussion of the ITAM program.)

USE-H016: Inherent to military training and testing is the possibility of munitions misfires and malfunctions. Rules and regulations exist to remove ordnance which lands outside approved Impact Areas. The Army is unaware of any "violations of the Fort Greely environmental statement" to which the commentor refers. The Army is subject to all applicable environmental laws and regulations.

USE-H017 and H018: Laser employment is only conducted on approved targets. Each target has been evaluated for laser use in accordance with Department of Defense health and safety standards. Approval is based on despecularized conditions, which means no reflective materials on the target or within 2,000 feet of the target. Reflection occurs only in areas of standing water (mirror-like pools), but the energy is reflected back into the air at the same angle that it hits the water. Due to absorption and divergence, the reflected beam poses no threat to airborne individuals. The only threat would be to individuals looking directly into the main beam. All individuals within 2,000 feet of the targets utilize protective eyewear so there is no threat from lasers. All military training is restricted when caribou or bison are present on the ranges.

Army range policy does not allow Depleted Uranium for general use on Impact Areas. It is only authorized under a special use permit.

USE-H015

USE-H016

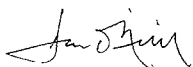
USE-H017

USE-H018

H

you can lase and blind animals and blind people if it's not being done right and you can do it at tremendous distances"? (LEIS p. SCP-84)

5. Is it true as Sheehan says that the Ft Wainwright Yukon Training Area lacks "the terrain required by regulation to keep fired munitions and laser beams within prescribed impact areas, boundaries and on post"? (LEIS p. SCP-45)
6. Is it true that the military is, in effect, expanding the bombing areas because it has labeled The Lakes area as a bombing area though Sheehan says "It is not now and never has been a bombing area...I drew those boundaries. I know what's supposed to be done there"? (LEIS p. SCP-86)
7. Is the military's record keeping of bombing activities so lax that it can be characterized as, in Sheehan's words, "continued, uncontrolled contamination"? (LEIS p. SCP-58)
8. Is it true as Sheehan says that "there are more duds in the Delta River than there are in Oklahoma Range. And I'm telling you that in all of the 60's and early 70's, the Air Force used Oklahoma as much as they are using it right now...and they didn't pick up the duds before they left"? (LEIS p. SCP-86)
9. Does the military intentionally drop bombs right in the water of the Delta River? Does it also drop bombs right in Delta Creek? Does the military realize that its own LEIS defines these explosive residues—not to mention the more-than-residual compounds found in duds—as a pollutant that can leave the bombing area via watercourses? Does it realize that the most important chum spawning grounds in the Tanana watershed is around the mouths of these two streams?
10. Is it true, as I understand Mr. Sheehan to say, that the military issued bogus clean-up documents: "This dud picking up business started about '82. Before that, they used to send statements, certificates that said there were no duds or all duds were cleaned up"? Does it also drop bombs right in Little Delta River? (LEIS p. SCP-86)
11. How many duds of what description fall into these various impact areas annually? Does the military keep records of each bomb, rocket or missile that does not explode? If not why not?
12. If it does not keep these records, and if it refuses to do so, can it say what percentage of each type of ordnance is statistically predicted to be a dud based on a reliability ratio for each type of ordnance? If not, why not?
13. The military claims that, on average, one-fifth of the impact areas are "cleared each year of live ordnance." On what basis is the claim made that the ranges are "cleared of live ordnance"? How many duds of what type are actually collected each year? How does this number compare with the actual or predicted number of duds? Isn't it true that as Sheehan says, "you can never clean up the Delta River, which is one of the big impact areas, and you can never clean up the Little Delta Creek"? (LEIS p. SCP-24)
14. With respect to unexploded bombs and rockets, what are the chances that the military will ever tell the public how seriously its activities are likely to contaminate the public's land? And isn't that what this environmental impact statement is supposed to do?



USE-H019

USE-H019: The Impact Area is the ground and associated airspace within the training complex used to contain fired or launched ammunition and explosives and the resulting fragments, debris, and components from various weapon systems. A weapon system Impact Area is the area within the surface danger zone used to contain fired, or launched ammunition, and explosives and the resulting fragments, debris, and components. Indirect fire weapon system Impact Areas include probable error for range and deflection. Direct fire weapon system Impact Areas encompass the total surface danger zone from the Firing Point or to a position downrange representing the maximum distance (AR350-2) and appropriate Department of Defense Range Safety Regulations.

USE-H020

USE-H020: This LEIS is not proposing to create new Impact Areas on Fort Greely or change the use of existing Impact Areas. The Kansas, Arizona, Nevada, Oregon, and Michigan Lakes Impact Areas (see Figure 2.c) are designated as Impact Areas. All are used for limited periods and are normally used for non-dud producing ammunition or explosives, which are cleared and returned to other training support purposes following termination of firing. This use of the Lakes Impact Areas will continue through the proposed withdrawal renewal.

USE-H021

USE-H021: Non-dud ammunition records are kept for an indefinite period with other range statistics. Records on dud-producing expenditures are kept permanently per military regulations. U.S. Army Alaska recognizes the inconsistencies in its record keeping on range use at Fort Wainwright and will correct that situation.

USE-H022

USE-H022: Routine decontamination operations are conducted each year on the Stuart Creek and Oklahoma/Delta Creek Impact Areas by the Air Force. Each year, all unexploded ordnance and inert residue are cleared to a radius of 1,000 feet from each of the Air Force's tactical targets. The access ways into the tactical targets and 100 feet on either side of the access ways are also cleared each year. The Air Force's routine decontamination operations are conducted on the Army's Impact Areas they utilize for training.

USE-H023

A discussion of the existing and proposed mitigation efforts can be found in Chapter 4.23.

FISH-H004

USE-H023: Air Force target arrays are placed on gravel bars no less than 50 feet from flowing water along the Delta Creek stream corridor. Army targets are also located within the Oklahoma/Delta Creek Impact Area and the Mississippi and Washington Impact Areas, through which the Delta River flows. The Army's proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources (see Chapter 4.23). An investigation of potential contamination migration routes is also included within this program.

USE-H024

FISH-H004: Please refer to proposed mitigation in Chapter 4.23 concerning pollution. At the present time no State or Federal agency has expressed concern about military actions affecting critical salmon habitat. Through the proposed mitigation, the Army will be studying if contaminants occur from military activity.

USE-H025

USE-H024: Current decontamination efforts on the withdrawal lands by the Air Force are documented. The Air Force completes a form indicating the type, amount, or weight of the live ordnance and munition residue it removes from the Impact Areas. Appendix 2.C

USE-H026

USE-H027

USE-H028

USE-H029

contains a compilation of the decontamination reports filed by the Air Force since 1986 on its decontamination efforts of the Stuart Creek and Oklahoma/Delta Creek Impact Areas.

USE-H025 and H026: Based on the live ordnance the military uses on Alaskan ranges, the dud rate would not exceed 5%. Records on dud-producing munition expenditures are kept permanently per military regulations.

USE-H027: Current decontamination efforts on the withdrawal lands by the Air Force are documented. The Air Force completes a form indicating the type, amount, or weight of the live ordnance and munition residue it removes from the Impact Areas. Appendix 2.C contains a compilation of the decontamination reports filed by the Air Force since 1986 on its decontamination efforts of the Stuart Creek and Oklahoma/Delta Creek Impact Areas.

USE-H028: Current, on-going decontamination efforts by the military are described in the response to POL- A002.

Cost and lack of unexploded ordnance characterization and excavation technologies are two major impediments to efficient and effective clearance of unexploded ordnance. As technologies improve, the effectiveness of remediation should increase and the time, cost, and environmental impacts for remediation should decrease.

USE-H029: This LEIS discloses all known impacts from the military's use of the withdrawal lands. Additional data needs to be collected to more completely assess the military's impacts on the environment. Chapter 4.23 discusses the proposed data collection and monitoring programs which will be implemented if the withdrawals are renewed. These programs will provide U.S. Army Alaska the scientific data to determine the extent of damage and formulate mitigation measures to reverse and prevent further environmental damage. This data is a critical component for the Army's Integrated Training Area Management Program (see Appendix 2.D for a detailed discussion of the ITAM program).

**U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL
ENVIRONMENTAL IMPACT STATEMENT**

COMMENT SHEET

DATE: 1/6/99
COMMENTOR'S NAME: Dennis Schlotfeldt

COMMENTOR'S ADDRESS: Box 71752
Fairbanks AK 99707

COMMENTOR REPRESENTING: SELF: X ORGANIZATION: _____

ORGANIZATION
NAME: _____

ADDRESS: _____

COMMENTS: Great Presentation - I Strongly Support
Continued Military Withdrawal BUT...
I think who ever wrote the section on Subsistence
fails to mention under the possibility of land going
to the state that access would increase along with
other benefits. I think the authors bias that control
by BLM would ~~not~~ be an improvement and control
by the state only a decrease demonstrates a lack of
knowledge of the reality and an objectivemath political
bias towards Federalism. I don't think Alaskans
appreciate the 'Spin'.

SUB-I005

RESPONSES TO COMMENT I

SUB-I005: Chapter 4.20 did not clearly state that access for subsistence users would improve under State as well as Bureau of Land Management control. The wording has been changed accordingly.

J

U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL
ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 1-6-99

COMMENTOR'S NAME: John Minchici

COMMENTOR'S ADDRESS: 60 Hall St.
FBKS, AK 99701

COMMENTOR REPRESENTING: SELF: ORGANIZATION: X

ORGANIZATION NAME: Salcha River Property Owners Assoc.

ADDRESS: 60 Hall St.
FBKS, AK 99701

COMMENTS: Public access should not be
limited in any way on any of
the existing roads or trails.

ACC-J010

RESPONSES TO COMMENT J

ACC-J010: Temporary closures can occur due to military activity. Temporary and permanent closures of roads or trails may occur to meet resource management objectives. Several planned resource management projects will improve trails. U.S. Army Alaska does not have plans to close any of the existing roads on Fort Wainwright Yukon Training Area or Fort Greely.

K

**U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL
ENVIRONMENTAL IMPACT STATEMENT**

COMMENT SHEET

DATE: 1/6/99COMMENTOR'S NAME: TODD BOYCECOMMENTOR'S ADDRESS: 3174 JUDY LANE
NORTH POLE, AK 99705COMMENTOR REPRESENTING: SELF: ☒ ORGANIZATION: _____ORGANIZATION
NAME: _____

ADDRESS: _____

COMMENTS: It would be very desirable to
exclude the Beaver Creek area from the
renewal. This area should be incorporated
into the Chena River State Recreation Area. In
this regard, it is not acceptable to lock up this
area for the next 50 years. ~~The~~ The military
should slightly shift their bombing area to ~~an~~
an alternate site to allow this area to safely
become usable to the public.

ALT-K011

RESPONSES TO COMMENT K

ALT-K011: Noted. Please refer to Chapter 2.3.3 for a discussion of the importance of this area's training infrastructure in achieving combat readiness and the excessive impacts to military training with the loss of the Beaver Creek-South Fork area. Loss of the Beaver Creek-South Fork Area would severely hamper the use of northern target formations, which would reduce the effectiveness of military training by affecting the military's ability "to conduct realistic combat training. This ultimately degrades the combat capability of military units in Alaska. Due to the excessive impacts to military training and the importance of this area's training infrastructure in achieving combat readiness, the Army and Air Force eliminated this alternative from further study.

L

U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL
ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 6 JAN 99

COMMENTOR'S NAME: JOHN E KARISH

COMMENTOR'S ADDRESS: P.O. Box 50628

NORTH POLE, AK 99705

COMMENTOR REPRESENTING: SELF: ☒ ORGANIZATION: _____

ORGANIZATION
NAME: _____

ADDRESS: _____

COMMENTS: A WELL PREPARED PRESENTATION. I FIRMLY
BEHAVE THE CONTINUED USE OF THIS RELATIVELY SMALL
AMOUNT OF LAND FOR TRAINING IS VITAL TO THE CITIZENS
OF ALASKA AND THE U.S.

John E. Karish

RESPONSES TO COMMENT L

ALT-L012

ALT-L012: Noted. Thank you for your comments.

ALASKA ARMY LANDS WITHDRAWAL
PUBLIC SCOPING MEETING
OPEN HOUSE

Thursday, January 7, 1999
2:00 p.m. to 8:00 p.m.
Volume 1 of 1

Proceedings Held
at
Egan Center Board Room
555 West Fifth Avenue
Anchorage, Alaska

Reported by:
Deirdre J.F. Radcliffe, Verbatim Shorthand Reporter

MIDNIGHT SUN COURT REPORTERS (907) 258-7100

2

PROCEEDINGS

(First statement convened at 3:06 p.m.)

PAMELA MILLER: I'm Pamela K. Miller, and I'm a biologist and program director of Alaska Community Action on Toxics, which is a nonprofit organization dedicated to protecting environmental and human health from the toxic impacts of contaminants, and I'd just like to register some oral comments today, and I'll be submitting more detailed written comments by the comment deadline.

But I want to say I have a very fundamental concern about the extension of the withdrawal for the continued use of these training areas by the military for bombing and other training activities involving artillery, primarily because there has been no ecological assessment of the impacts of past and present testing on those ranges, and I'm concerned not only about the safety hazards

RESPONSES TO COMMENT M

POL-M007

POL-M007: Please refer to responses for POL-A001 and POL-A002. Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

G

- to humans but also the chronic and cumulative
- long-term impacts of the toxicological hazards
- associated with the munitions testing and the
- potential contamination of surface and groundwater.

And my opinion about this is that the
· military should not be allowed continued use of these
lands until a comprehensive assessment has been done

MIDNIGHT SUN COURT REPORTERS (907) 258-7100

3

to determine what the impacts have been, major extent
of the contamination that exists on the land, and the
potential migration of contaminants into surface
groundwater and into other potential exposure
pathways, including wildlife and humans.

So I guess that's all I'd like to say
right now. I will be submitting written comments.
(Statement concluded at 3:08 p.m.)

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4

CERTIFICATE

I, DEIRDRE J.F. RADCLIFFE, Verbatim Shorthand
Reporter and Notary Public in and for the State of
Alaska, do hereby certify:

- That the foregoing proceedings were taken before
me at the time and place herein set forth; that the
proceedings were reported stenographically by me and
later transcribed under my direction by computer
transcription; that the foregoing is a true record of
- the proceedings taken at that time; and that I am not
 - a party to nor have I any interest in the outcome of
 - the action herein contained.

IN WITNESS WHEREOF, I have hereunto set my hand
· and affixed my seal this day of ,
1999.

DEIRDRE J.F. RADCLIFFE

Notary Public for Alaska

My Commission Expires: 5-19-02

N

U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 1/7/99COMMENTOR'S NAME: Jack G. McCombsCOMMENTOR'S ADDRESS: P.O. Box 71128
Fair banks, AK 99707COMMENTOR REPRESENTING: SELF: # ORGANIZATION: _____ORGANIZATION
NAME: _____

ADDRESS: _____

COMMENTS: _____

- 1) 50 Year renewal far too long a period of withdrawal. Things change rapidly in the world and there is every likelihood that Ft. Wainwright will not even exist in 50 years, and if it wasn't for Sen. Stevens, probably wouldn't exist even now. TEN YEARS MAX.

ALT-N013

- 2) Public access must be maintained to the old Johnson trail (Johnson road, newly developed and named Brigadier road, etc.) to the upper Salcha River valley. Originally a tractor trail established in the 1930's to support mining activities in the upper Salcha river valley, its use has expanded in the last 25 years or so as increased numbers of persons have become dependent upon these roads/trails to access their homes, cabins, traplines/mines during seasonal transitions and during emergencies.

ACC-N011

RESPONSES TO COMMENT N

ALT-N013: Noted. The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ACC-N011: The Army would not permanently close Brigadier Road if it retained the Yukon Training Area. The road could be closed temporarily due to military activity within the training areas and for activities in the Stuart Creek Impact Area where the road crosses the Buffer Zone.

O

U.S. ARMY ALASKA LANDS WITHDRAWAL RENEWAL
ENVIRONMENTAL IMPACT STATEMENT

COMMENT SHEET

DATE: 1/11/99

COMMENTOR'S NAME: John Fields

COMMENTOR'S ADDRESS: 2050 Resolution Road
Fairbanks Alaska
99712

COMMENTOR REPRESENTING: SELF: ☒ ORGANIZATION:

ORGANIZATION
NAME:

ADDRESS:

COMMENTS: I feel that 50 year is
an excessive time frame for removal.

The areas should be reduced
& the lands should be opened up for
resource development on one surrendered lands.

The Ft. Greely area should be
turned over to the state of Alaska for
disposal to the general public.

The military has not been a good
neighbor in the last few years. I understand
that they are a major contributor to the
cleaning of the North Star Borough. However this
does not excuse the military for their negligence
when dealing with the private citizens & the
owners of the Borough. The military must
remember that Alaska is a State, not an occupied
territory & that they (military) are not
the protection guard.

RESPONSES TO COMMENT O

ALT-O014

ALT-O014: Noted. The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ALT-O015

ALT-O015: Army and Air Force needs require renewal of the existing withdrawals in their entirety. Please see Chapter 2.3 for a discussion of the alternatives eliminated from consideration in this withdrawal renewal action, which includes the reasons for their elimination.

P

ALASKA TRAPPERS ASSOCIATION

P.O. Box 82177
Fairbanks, Alaska 99708

January 14, 1999

Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Re: Draft Legislative EIS - Alaska Army Lands Withdrawal Renewal

Dear Ms. Herdrich:

Thank you for the opportunity to comment on the EIS and your process for presenting it to the public. Our non-profit group was established more than 25 years ago. We have just over 1000 members and represent trappers across Alaska. We strive, through various activities and programs, to ensure that furbearers, trapping and trappers are treated fairly.

We have some general comments about process and presentation as well as some more specific ones about the impacted furbearer resources and trapping.

1. We were very disappointed to find out the meeting in Fairbanks on January 6 that was widely billed as a public hearing, was actually nothing more than a public relations exercise by the military and your organization. We often deal with bureaucracies pushing unpopular activities and plans, so we are aware that agency personnel are trained to use the "open house tactic" to deflect criticism. But there are times when public hearings are appropriate. When your monitor at the doorway encouraged us to sign in for the "public hearing," we believe you should actually hold a public hearing and take testimony. **OTH-P007**

2. It is unrealistic to summarily dismiss other obviously workable and publicly popular (though perhaps not as palatable to the military) alternatives. To suggest that the only options are no withdrawal or withdrawal for 50 years is disingenuous at best. A more reasonable approach is to discuss other, shorter time frames. We suggest that a 10 year withdrawal is far more appropriate considering the dynamics of military training requirements and the general land management situation. **ALT-P016**

3. It is also obvious that the military should consider relinquishing the many areas it does not actually use. The tactic of claiming that the areas are all too contaminated and it is impossible to clean them up or certify them as clean, is just too transparent to be used anymore. **ALT-P017**

4. Our reluctance to endorse a withdrawal of a longer duration is based on our extensive

RESPONSES TO COMMENT P

OTH-P007: The advertisements in the *Fairbanks News Miner*, *Anchorage Daily News*, and the *Delta Wind* newspapers announced Public Meetings the first week in January to obtain comments on the Draft LEIS. The ad further explained the meetings will be conducted as Open Houses to give the public the opportunity to meet with representatives on an individual basis. The dates with the locations clearly stated Open House with a time period from 2-8:00 p.m.

During the scoping process, both Open Houses and Public Hearings were held to obtain testimony. The positive feedback from individuals participating in the Scoping Open Houses led the Army to utilize an Open House meeting format to obtain comments on the Draft LEIS. In addition, the Open House format allowed a six hour time period during which the public could provide comments. During Public Hearings, individuals are usually limited to the amount of time they can speak. The Open House meeting format did not limit the amount of time an individual spent addressing their concerns or comments with the representatives present. In addition, U.S. Army Alaska provided a court reporter at each Open House for the six hour duration to record the testimony of those attending.

All individuals attending the Open Houses were asked to sign a log so their names and addresses could be added to the distribution list to receive a copy of the Final LEIS.

ALT-P016: Noted. The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A creditable operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ALT-P017: Please see Chapter 2 for discussions on Military Operational Parameters and the military's use of the withdrawal lands.

Contaminated areas on the withdrawal lands are those used as Ranges or Impact Areas. The level of necessary decontamination efforts determines its cost. In addition, extensive decontamination efforts impose significant impacts on the environment. Total decontamination efforts must be weighed against the feasibility of incurring a tremendous cost, both monetarily and environmentally.

P

experience with the impacts of military control on our user group. With continued military control comes a dizzying array of confusing and discriminatory regulations. For example, trappers are required to attend a military orientation and safety course, sign liability waivers, and call in to the MP station before entering the lands to trap. Meanwhile, any number of recreational snowmachiners, dogmushers, ATV's, etc use the areas without restriction or requirements.

5. Though a minor point, we found it disconcerting when we visited the Open House, to find the Wildlife Station adorned with a photograph of a coastal brown bear. Don't your wildlife "experts" know that these bears are not found anywhere in the area being considered?

6. Trapping and furbearers are dealt in a disappointingly superficial way. To not deal with these subjects in depth is irresponsible and makes other sections of the EIS suspect.

Trapping is the primary civilian use of these areas for 5 to 6 months of every year. This fact alone would indicate that the subject deserves a more complete discussion. You cannot evaluate impacts on this activity by simply ignoring it. As far as we could tell, no impacts to furbearers (under either alternative) were discussed at all.

7. At the Open House in Fairbanks, our representative pointed out this failing to the lady at the Wildlife Station. She at first claimed that only ADFG managed furbearers and trapping and that no data was available. When we informed her that we knew that the military was requiring trappers to fill out harvest reports, she then said that the military had not furnished any such information and that she "did not have time to look for it."

We would submit that much more appropriate and detailed information and data are available. Just because one of your employees finds it difficult to locate does not give you license to ignore it in your EIS.

In short, we feel that the "fix is in" for a 50 year withdrawal and that nothing the public says will change anyone's mind; the EIS as submitted is just fulfilling a legal requirement. The EIS does not deal responsibly or adequately with the furbearer resource. Finally, you should seriously consider the option of renewing the withdrawal for a more reasonable period of time. We suggest 10 years.

Thank you for the opportunity to comment.

Very truly yours,



Pete Buist
President

REC-P003

REC-P003: The following is required to trap on the withdrawn lands.

- A. Register your trap line.
- B. Receive a Hunting, Trapping, and Fishing card from the Army. This requires filling out a form and signing a safety waiver stating that you will be aware of the military regulations. A supplement copy of the regulations is provided to trappers at the desk and a permanent copy is also available.
- C. Place signs at the start of your trap lines.
- D. Call in and out when entering and leaving Army lands.
- E. Fill out a harvest report at the end of the season.

These requirements do not appear to be extreme, confusing, or discriminatory. These requirements are basically the same for all hunters. Black bear baiters also must register bait stands, mark the area with a sign, and send in an additional harvest report for spring black bears.

REC-P004

REC-P004: No one representing the Alaska Trappers Association attended the scoping meetings, nor did anyone contact us with concerns about trapping on withdrawal lands. The trapping information given in the DLEIS is very brief. At the time the DLEIS was being written, the harvest reports for the posts were not available. Because the Army would not significantly change its regulations on trapping and since concerns were not raised during scoping, minimal discussion of trapping was included in the Draft LEIS. The public expressed concern about sensitive wildlife habitat and therefore more time was given to this topic to cover this significant issue. Please review Chapter 3.17.2 for trapping harvest numbers for Fort Wainwright. Harvest numbers are not available for Fort Greely.

Q

Alaska Army Land Withdrawal Comment/Concerns Submittals

Monday, 25 January 1999

RESPONSES TO COMMENT Q

ALT-Q018: Noted. Thank you for your comments.

FIRE-Q003: Firefighters were removed from the military land during the 1998 Carla Lake fire due to ordnance being found in the fire area. An air attack was continued. While removal of ground personnel may have contributed to the fire escaping military lands on May 27th, it cannot be known for certain. The events of June 8th show that given an almost identical situation in terms of containment and weather conditions, the ground-based attack on State of Alaska land, with 750 personnel assigned, also failed to contain the Carla Lake fire. The community of Delta Junction was never threatened by the fire (Dave Jandt, Fire Management Officer, Military Lands, Alaska Fire Service, 1999).

ACC-Q012: Army Regulation 385-63 requires marking range boundaries every 200 meters. A waiver for Fort Greely concerning this regulation is on file at the Directorate of Plans, Training, Security, and Mobilization at Fort Richardson. The cost of marking the Impact Areas every 200 meters is estimated to cost millions of dollars. Fort Greely Range Control announces temporary closures and areas that are off-limits permanently via weekly radio announcements. Please review Figure 3.16.b for locations of access restriction signs and gates and Chapter 3.16 and 3.17 for more detailed information on area closures.

OTH-Q008: Movement of troops and vehicles occur between Fort Wainwright and Fort Greely. Large convoys occur primarily during the military's major training exercises. Military use of Fort Greely will continue under the preferred alternative. Affects on convoys as a result of the BRAC action at Fort Greely are outside the scope of this withdrawal renewal action. Those affects should be addressed in the NEPA documents being prepared in accordance with BRAC.

Name: Bill Barron

Organization:

Address: Box 59

Delta Junction, AK 99737

Comment: My family and I are opposed to any lease extension for the Fort Greely West / Yukon Training Area.

ALT-Q018

During the summer of 1998 there was a wildfire in that area. Military authorities did not permit firefighters to enter the ranges because of the danger. As a result the fire grew out of control and threatened to jump the river and destroy Delta Junction. This fire destroyed thousands of acres of land.

FIRE-Q003

Secondly, the Fort Greely ranges are not secure and are open to the public. If the area is so dangerous, then why is not completely secured?

ACC-Q012

Finally, the troop convoys on the road from Fairbanks create hazardous traffic situations both in the winter and in summer. The Richardson Highway is in poor condition and dangerous in the winter. The recreational vehicles in the summer are numerous and add to the problem.

OTH-Q008

Please do what is necessary to restore these ranges to the way they were before the army destroyed them.

Thanks



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ALASKA MINERS ASSOCIATION, INC.

3305 Arctic #202, Anchorage, Alaska 99503 FAX: (907) 563-9225 Telephone: (907) 563-9229

January 23, 1999

Ms. Cindy Hirter
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Re: *Alaska Army Lands Withdrawal Renewal, Draft Legislative Environmental Impact Statement (LEIS)*

Dear Ms. Hirter,

The Alaska Miners Association appreciates the opportunity to review and comment on the proposal to extend existing withdrawal of about 871,500 acres of public land in Alaska for military purposes as outlined in the referenced LEIS. The LEIS proposes to extend the existing withdrawals that expire November 6, 2001 for a period of 50 years, or November 6, 2051.

The Alaska Miners Association appreciates and supports the Military role in Alaska. However, we have several concerns about both the length of the proposed withdrawal and the lack of any reasonable consideration of mineral values of the withdrawn land.

Length of the Proposed Withdrawal

The LEIS notes that the State of Alaska also has valid state selections for recreation, minerals, wildlife, forestry, agriculture, and settlement values on these lands. The LEIS did not consider (1) changing nature of the Army and its potential need for these lands, and (2) the impact of delaying for 50 years the State of Alaska's opportunity to fulfill its Congressional entitlements under a variety of Federal Laws.

Our specific concerns are directed to the mineralized land that are outside the "High Hazard Impact Area" and the "Impact Area Buffer Zone" shown in Figures 2.b through 2.e when compared to geology and minerals shown in Figures 3.4.a and .b and 3.5.a through 3.5.c.

The LEIS seems to premise the recommended 50-year extended withdrawal period for the of these public lands simply on the basis that the land has been withdrawn for about 50 years. There is no analysis about how the role of U.S. Military has changed in the past 50 years or on how it is projected to change by 2051. Based on the changes in even the last 10 to 15 years in Alaska, it is entirely plausible that new weapons, communication and guidance systems and a smaller, more specialized military force would no longer need the entire 871,500 acres in the near future. **To extend the closures for 50 years without an effective evaluation of these two issues, (1) and (2) above, would make the LEIS defective and would be arbitrary and capricious.**

RESPONSES TO COMMENT R

ALT-R019: Noted. Thank you for your comments.

ALT-R020: Refer to Chapters 1.2 and 2.1.3 for a discussion of the military's continuing need for the withdrawal lands.

The State of Alaska has top-pled on the military withdrawal lands; these top filings are not valid State selections. For comparison analysis in this LEIS, it was assumed the lands would be adjudicated to the State under the No Action Alternative. It is impossible to predict the likelihood these lands would be adjudicated to the State. At this time, the withdrawal lands top filings are not designated high priority selections by the State. However, the State updates its conveyance priorities annually, so the selection status could change.

ALT-R021: The trend in warfare has moved toward a highly mobile air and ground force supported by massive firepower capable of attacking over much wider and deeper areas. The increased range, speed, and firepower inherent in combat units equipped with modern weapon systems have increased the need for larger training areas. See also *Military Operational Parameters, Chapter 2.1.1*.

The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ALT-R019

ALT-R020

ALT-R021

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Recommendation: The period for withdrawal should not exceed a period of ten (10) years, or no longer than November 6, 2011. This will require the federal government to reevaluate the role of the Military in Alaska and how these withdrawals fit. It will also allow the State of Alaska to reevaluate its outstanding land entitlements to see if it still wishes to get title to all or parts of the existing withdrawal.

Minerals Alternative

P.L. 96-606 provides for mineral prospecting and mineral extraction of large portions of many military bases. In our comments to the Bureau of Land Management Military Withdrawals Planning Team on February 14, 1994 we noted “Many...bases, like Fort Wainwright, are used, in some areas, for maneuvers and live ammunition firing. The two activities, military training and mining, can with forethought and planning take place on the same or adjoining lands....” The LEIS considered and rejected Alternative 2.3.4 that would give the Bureau of Land Management the exclusive authority, *without* military concurrence, to grant use of the withdrawn lands for mineral extraction under General Mining Laws, material sale, and mineral leasing laws. We agree that as long as there is a viable military mission requiring these land that non-military uses require input from the military. It is reasonable and responsible to eliminate that alternative from further consideration.

The LEIS shows there are significant areas within the 871,500 acres having suspected economic mineral values that are lightly used and are not associated with either the high hazard or buffer zones. Given this fact, there is clearly an unevaluated alternative that provides reasonable access to public land under the General Mining Laws, materials sale, and mineral leasing laws that must be given full and thoughtful consideration. We made this very observation to the to BLM in 1994. **For this reason, the LEIS is defective in not considering a viable alternative that is now working successfully on other military bases and to do so is arbitrary and capricious.**

Recommendation: We respectfully request that full consideration be given to an alternative having public land in a military withdrawal open to the operation of the General Mining Laws, materials sale, and mineral leasing laws in full consultation with the appropriate base commander having the responsibility of determining when there would be a conflict between the military mission and exploration and extraction of minerals. We are ready and willing to assist in developing such an arrangement and procedure. Minerals uses in the high hazard and buffer zones are likely not appropriate, but this should be evaluated to validate that fact.

The LEIS on page ES-7 argues that “mining activities, if not done carefully, can destroy habitat and affect water quality” is a reason why the existing military withdrawals should be extended for 50 years. The Alaska Miners Association strongly objects to the inference that mining under federal and state law and regulation would be done other than “carefully” when under the full requirements of both the Secretary of the Interior, Secretary of Defense and State of Alaska. The Alaska State reclamation law specifically to all lands in the state and this includes military lands. **The statement should be deleted from the final LEIS.**

ALT-R022

ALT-R022: Noted. See previous two responses.

ALT-R023

ALT-R023: Noted.

MIN-R003

MIN-R003: Please refer to Chapter 2.3.4 for a discussion of an alternative where the Bureau of Land Management would retain authorization for mineral extraction on the withdrawal lands.

ALT-R024: The statement “if not done carefully” was omitted from the Final LEIS. The commentor correctly states that mining is subject to stringent State and Federal environmental regulations, and the same point is made in the Draft LEIS (Chapter 4.5). Permits would not be issued for mining activities on any State or Federal lands without an assessment of potential impacts and mitigating measures.

ALT-R024

The analysis of the No Action Alternative describes potential impacts if Congress does not grant the withdrawal renewals. The discussion is not provided to support the withdrawal renewals, but to provide a comparison of potential impacts under each alternative.

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Federal Legislation to Extend the Existing Military Withdrawal

The Alaska Miners Association assumes that federal legislation will be proposed to implement the final LEIS. As discussed above, any federal legislation to extend the existing withdrawals should be not extend beyond the year 2011 and should contain a provision for shared decision making by Department of the Interior, Department of Defense and State of Alaska to provide reasonable access for mineral prospecting and mineral extraction when determined compatible with the primary military mission.

Several provisions unique to Alaska need to be considered in the legislation: (1) application of the General Mining Laws, mineral sale, and mineral leasing laws to certain areas, (2) completion of modern geologic and geophysical studies of the areas to evaluate the areas for mineral development that have been selected by the State of Alaska. These are discussed below:

Mineral Information

The LEIS indicates that the mineral values of the withdrawn lands are not known because the land has been withdrawn from location and entry under the federal mining laws since the 1950's. The methods used to locate mineral occurrences and evaluate their prospective economic values have changed as much as military weapons systems over the same period. The Fort Knox mine to the north and west of Fairbanks and the recent Pogo mineral property northeast of Delta Junction are two examples of new geologic models. These models did not exist even 15 years ago and today they are providing new jobs and economic opportunities to these communities where military facilities and activities are being reduced or eliminated. It is like comparing the technological ability of a Corsair to complete a mission with an A-10 or a Cobra gunship. The State of Alaska Geological and Geophysical Surveys has an excellent reputation for working cooperatively with a variety of Native Corporations, local entities, industry, and Bureau of Land Management to conduct airborne geophysical surveys that provide a threshold identification of potentially economic mineral deposits.

Recommendation: In addition to opening various lands to operation of the General Mining Laws, the LEIS and draft legislation should include recommendation for joint airborne geophysical surveys and associated on-the-ground technical evaluation of lands not opened. This would be done jointly during the next 6 years by the military, Bureau of Land Management, and Alaska Division of Geological and Geophysical Survey and would allow meaningful consideration of the mineral potential of the military lands not opened to operation of the General Mining Laws and prepare the military for the next review of the lands prior to expiration the then existing withdrawal.

State Selection and Federal Mining, Materials Sale, and Mineral Leasing Laws.

A valid State selection segregates the federal land selected from location and entry under the General Mining Laws, materials sale, and mineral leasing laws. Under Alaska mining law, a person may enter selected land and by posting and notice create a prospective future private mineral right. That future right is consummated only when two things happen: (1) The State receives title to the land from the federal government [such cannot occur until the military withdrawals expire or the area is no longer needed for military purposes and the withdrawal is

**ALT-R024
cont.**

MIN-R004

MIN-R004: The LEIS (Chapter 4.5) also emphasizes the role of modern methods in locating important mineral deposits.

Conducting airborne geophysical surveys for mineral resource development is not a requirement for the military use of the withdrawal lands.

MIN-R005

MIN-R005: Please refer to the response to comment ALT-R020.

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removed] and (2) The land has not otherwise been closed to mineral entry under State law. Mineral properties located under this provision can be developed into operating mines only with specific approvals of both the State and Bureau of Land Management, and in this case the local base commander.

**MIN-R005
cont.**

The state selection, therefore, creates a dilemma that can only be solved in the federal legislation. There are at least two way that the federal legislation can resolve this dilemma:

(1) Explicitly recognize the existing provision of State mining law to create prospective future private mineral property right with Department of the Interior, base commander, and State of Alaska controlling the on-the-ground mineral activity with due deference to the Military mission, or

(2) Explicitly recognize the existing state selection but permit entry and mining operations under the General Mining Laws, mining, materials sale, and mineral leasing laws with a provision that the federal mining claims be converted to state mining claims automatically when the land is transferred to State ownership.

Conclusion

In conclusion, the Alaska Miners Association supports the Military mission in Alaska and many of our members are veterans of WW II, Korea, Viet Nam, Desert Storm, as well as other conflicts. We strongly believe that there is reasonable, compatible opportunity for mining activities to occur on some of the lands now proposed for withdrawal and we have addressed these above.

Attached is a copy of the most recent report on mining in Alaska which includes comments about the significance of the Fort Knox and Pogo projects. The available minerals information for the military lands suggests the strong possibility for Fort Knox and Pogo style mineral deposits may lie in the lands now being considered for continued withdrawals.

Please contact use if we can be assistance in clarifying our comments or in drafting federal legislation to implement an extension of the existing withdrawals that would not exceed 20 years.

Sincerely,



Steven C. Borell, P.E.
Executive Director

enclosure - Alaska's Mineral Industry, 1997. Special Report 52 (only with letter to addressee)

cc: Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young
Governor Tony Knowles
DNR Commissioner John Shively



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ALASKA MINERS ASSOCIATION, INC.

3305 Arctic #202, Anchorage, Alaska 99503 FAX: (907) 563-9225 Telephone: (907) 563-9229

February 5, 1999

Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Subject: Additional Comments on - Alaska Army Lands Withdrawal, Draft Legislative
Environmental Impact Statement

Dear Ms Herdrich,

There are additional documents that should be considered as part of your evaluation of this Alaska Army Lands Withdrawal, Draft Legislative Environmental Impact Statement (DEIS) and some analysis of the mineral potential of the subject areas that need to be considered in your evaluation of this withdrawal.

Past Army Planning Documents and Promises

The two additional documents that must be considered and our comments on these documents and the promises made in them are as follows:

Document1: Proposed Resource Management Plan for the Fort Greely Maneuver Area and Fort Greely Air Drop Zone, Final Environmental Impact Statement. Dated 1994. This document was developed by the Department of the Interior, Bureau of Land Management, Steese-White Mountains District and the U.S. Army 6th Infantry Division (Light).

On page 17 this document contains the following statement (our bold for emphasis) regarding mineral resources:

“Proposed Action 22 The withdrawal area will remain closed to the operation of the Mining Law of 1872, the mineral Leasing Act of 1920 as amended, the Mineral Leasing Act for Acquired Lands of 1947, and the Geothermal Steam Act of 1970. Pursuant to Sec. 12(a) of the Military Lands Withdrawal Act, **the Army and BLM, by 1996 and at least every five years thereafter, will jointly reconsider whether it would be appropriate to open portions of the withdrawal to the operation of the mineral laws.**”

On page 56 this commitment to joint review and evaluation is repeated: “...**reexamine what areas may be suitable for opening by 1996 and at least every five years thereafter.**” This management plan also states that no consideration was given to lode mining or coal development. This means that some of the most important mineral projects in Alaska were not considered in the Army/BLM joint findings. One example is the Pogo Project located about 35 miles northeast of Delta Junction. With an estimated resource of more than 5.2 million ounces of gold, Pogo is now the highest priority exploration target area in North America and the surrounding lands are nearly all covered with state mining claims. This has all occurred over the past 5 years. Regarding coal, in 1994 the State of Alaska held a competitive coal lease

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sale in the Jarvis Creek Coal Field to the south of Delta Junction. Given the mineral endowment of the area and the tremendous interest by mineral companies it is crucial that lode minerals and coal be evaluated in all planning and the Final LEIS.

Document 2: Proposed Resource Management Plan for the Fort Wainwright, Yukon Maneuver Area, Final Environmental Impact Statement. Dated 1994. This document was developed by the Department of the Interior, Bureau of Land Management, Steese-White Mountains District and the U.S. Army 6th Infantry Division (Light).

Pages 16 and 46 of this Fort Wainwright 1994 document repeats the statements the Fort Greely document referenced above regarding joint Army/BLM evaluation of the minerals every five years.

The Fort Knox Mine is near Fort Wainwright and the lands being considered in the EIS are prospective for the same type of mineral deposit found at Fort Knox. Fort Knox is one of the largest gold mines in the U.S. and is producing at a rate of 400,000 ounces per year while providing more than 250 skilled, permanent, year-around jobs. These jobs are extremely important, especially considering the recent and on-going reductions in the military activity in Alaska. There are also numerous adjacent mineral properties such as True North and these were also evidently ignored in the joint Army/BLM finding.

The Final LEIS should: 1) include a complete evaluation of the mineral potential of the lands inside the two military withdrawals; 2) evaluate and discuss the findings regarding mineral development compatibility with Army uses as promised in these documents; 3) specifically show the rationale used by Army/BLM and the extent that mineral exploration and production were or were not compatible with military use inside and outside the hazard/buffer areas shown in the 1998 LEIS; 4) present and discuss how the mineral compatible finding commitment will be completed for the five-year period 1996-2001; 5) fully justify the change from a joint 5 year evaluation to the 50 year closure being proposed; and 6) as discussed below the adverse impacts to mineral lands outside the withdrawals where access would likely be through the withdrawal.

Finally, will the 1996-2001 minerals reconsideration be available for consideration prior to the introduction of legislation to extend the existing withdrawals, and if not, why? Given the inconsistencies between the current proposed 50 year withdrawal and past promises of joint Army/BLM evaluation every five years, to not fully evaluate the mineral potential and address the other related issues would be arbitrary and capricious and constitute a fatal flaw for the Final LEIS.

Analysis of Mineral Potential

Alaska exploration geologist Tom Bundtzen, of Pacific Rim Geological Consulting, talked at length with one of the Army's consultants Carol Klein about mineral resource potential during the fall of 1997. He provided her with a run-down of the geology and resource potential of the areas now being proposed for withdrawal and supplied references, maps, and a list of other experts that she could contact. Mr. Bundtzen provided me with additional comments on the minerals discussion in the Draft LEIS which I summarize below.

1. Given the recent discoveries of the Pogo, Fort Knox, and many other granite-hosted gold-polymetallic deposits in the Yukon-Tanana Upland, the mineral industry will be very interested in exploring the Eielson Pluton and other plutonic bodies in both the Wainwright and Greely withdrawn areas. This is especially the case for the Fort Wainwright-Yukon Training area, if it was open to mineral entry. The statement that appears on page 3-16 "The geochemistry of the Eielson Pluton is not considered favorable for gold deposits" is based on an iron oxide fugacity/alkaline ratio, which has been used by some to predict gold favorability. However, negative geochemical results would not deter modern exploration from looking

MIN-R021: The publication provided by Alaska Miners Association provides details about the mining industry's activities, expenditures, jobs, and production in Alaska in 1997. The LEIS (Chapter 3.5) acknowledges the high level of activity in Alaska's mining industry, and recognizes the importance of the Fort Knox and Pogo projects. However, lands within the withdrawals were not previously identified as high priorities by the mining industry. Access issues notwithstanding, the withdrawals are largely covered by floodplain deposits and thick overburden which, in the past, made them somewhat less attractive for exploration.

1) Conducting an evaluation of the mineral potential is not a requirement for the military use of these withdrawal lands.

2) Mineral development compatibility with Army uses has been evaluated by the military and the BLM on a case-by-case basis whether it is appropriate to open the withdrawal lands to the mining laws that do not conflict with the military mission.

MIN-R021

3) The primary use of the withdrawal lands is to complete the military mission.

4) An evaluation of the compatibility of mineral development with Army uses during 1996-2001 is not within the scope of the LEIS because these lands are currently withdrawn until November 6, 2001. This LEIS proposes to renew the withdrawal beginning November 6, 2001.

MIN-R022

5) The 50 year withdrawal renewal has no bearing on the 5 year joint evaluation.

6) To this date, no access through the withdrawal property has been requested. If this issue does arise, the Army and BLM will address it appropriately.

MIN-R022: This request is outside the scope of the LEIS. This LEIS only address issues that will occur after 2001. These requests are evaluated on a case-by-case basis.

MIN-R023: The additional input from AMA is appreciated. As discussed in the response to MIN-R021, the withdrawals are largely covered by floodplain deposits and thick overburden which, in combination with the land status, has made them somewhat unattractive as exploration targets in the past. However, the mineral industry's current interest is noted.

MIN-R023

Regarding the Eielson Pluton, Chapter 3.5 *Locatable Minerals* will be amended to note that geochemistry is not always a conclusive indicator of gold favorability.

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at the Eielson pluton for its potential to host gold mineralization. Plutonic rocks that host gold mineralization at Donlin Creek in southwest Alaska, for example, do not always show a positive gold favorability using this method.

2. As indicated in the Draft LEIS, the potential to host massive sulfide deposits that contain lead, zinc, copper and precious metals is moderate to high for both the Fort Greely and Fort Wainwright areas. For example Grayd Resources recently announced a significant grade and tonnage estimate for their volcanogenic massive sulfide (VMS) deposits on Dry Creek, about 6 miles west of the western boundary of the Fort Greely military withdrawal. It is certain that both withdrawn areas would be explored for massive sulfide deposits of either the shale-hosted (like Red Dog) or VMS types, if these lands were open to mineral entry under either the federal or state mining laws. The VMS deposits are associated with a belt of Devonian-Mississippian metamorphosed volcanic rocks that crop out more-or-less continuously across the Fort Wainwright withdrawal and along the southern and western boundaries of the Fort Greely withdrawal. A parallel belt of black shales may contain shale hosted mineralization. The deposit description summaries are correctly stated in the Draft LEIS, however, the potential areas as depicted on Figure 3.5a should be extended to include the lands described above because they are underlain by lithologic units having a high potential for economic mineral deposits.

3. One of the chief concerns with the Draft LEIS is the lack of any discussion on surface access. This means surface access to high potential mineral lands adjacent to the military withdrawals and how the withdrawals impact those exploration and development activities outside the two withdrawals. The uplands on three sides of the Fort Wainwright withdrawal are currently a beehive of exploration activity by more than 15 mining companies searching for Pogo, Fort Knox or other deposit types in the historic Goodpaster Mining District. The entire western flank of the Fort Greely area is the focus of extensive exploration for VMS deposits as indicated above.

4. Because much of the geological data was collected more than 25 years ago (before modern systematic mineral exploration was deployed), there is a compelling need for a systematic, field-based mineral resource assessment. A mineral resource assessment that would utilize detailed 1:63,360 mapping, and airborne geophysics is essential to help better quantify the mineral resource potential of the areas proposed for withdrawal. A mineral resource assessment is also essential for the military and BLM to fulfill the promises for periodic mineral review referenced above.

Thank you for the opportunity to comment on this important issue. If we can be of assistance in development of a plan to effectively evaluate the mineral potential of these two withdrawal areas, logical access routes across the withdrawal areas, or other such issues please contact us.

Sincerely,



Steven C. Borell, P.E.
Executive Director

cc: Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young
Governor Tony Knowles
DNR Commissioner John Shively

MIN-R024

MIN-R024: Changes have been made in Figures 3.4.a, 3.4.b, and 3.5.b to conservatively extend some of the geologic units beyond the withdrawal boundaries. The text in Chapter 3.5 has also been amended to include a discussion of current exploration for VMS mineralization in the Bonifield District.

MIN-R025

MIN-R025: As discussed in Chapter 4.16 *Public Access*, public access on the withdrawn lands is a significant issue with residents of Fairbanks, Delta Junction, and the surrounding communities. Under the Preferred Alternative, the Army would continue to provide public access onto and through the withdrawn lands, subject to necessary constraints for safety and security.

MIN-R026

MIN-R026: The statement will be omitted from the Final LEIS. The commentor correctly states that mining is subject to stringent State and Federal environmental regulations, and the same point is made in the Draft LEIS (Chapter 4.5). Permits would not be issued for mining activities on any State or Federal lands without an assessment of potential impacts and mitigating measures.

The analysis of the No Action Alternative describes potential impacts if Congress does not grant the withdrawal renewals. The discussion is not provided to support the withdrawal renewals, but to provide a comparison of potential impacts under each alternative.

Conducting an evaluation of the mineral potential, including airborne geophysical surveys, is not a requirement for the military use of these withdrawal lands.

T
DAN O'NEILL
2590 HOME RUN
FAIRBANKS, ALASKA 99709
PH. & FAX: 907/479-2988

January 26, 1999

Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Educational Building
Colorado State University
Fort Collins, CO 80523

The following comments are offered on the *Alaska Army Lands Withdrawal renewal: Draft Legislative Environmental Impact Statement*. These comments are in addition to comments I submitted on January 6, 1999.

Recordkeeping

In recent statements reported in the Alaska press, Army Secretary Louis Caldera has presented the Army as a "good environmental steward," and noted efforts to remedy "mistakes of the past and make sure we don't repeat those mistakes." One of the mistakes of the past is the matter of recordkeeping. In the past, as one military historian has written about nerve gas testing at the Gerstle River Test Site, records were either destroyed, not kept or lost:

When the program terminated in the late 1960's, records of the testing inexplicably disappeared, apparently destroyed. What files remain confirm sloppy record-keeping which failed to identify the type of weapons being tested or how and when they were disposed of. (Neilson, Johnathan M.; *Armed Forces on a Northern Frontier: The Military in Alaska's History, 1867-1987*; Greenwood Press; 1988; p. 210.)

I wonder if the secretary is aware that the US Army in Alaska is currently sending tens of thousands of munitions annually into public lands and failing to record the quantity and type of these munitions? Incredibly, on page 2-23 of the LEIS, the Army indicates that only records for the last *two years* are available. And that fact is followed by this rather amazing notation:

For both years reported, Army records had 595 entries that ammunition was used in training, but 439 entries showed either no data, unknown, or not available. Therefore, ammunition expenditure amounts are understated.

Well, they would be understated, wouldn't they, if Army personnel are failing to record the information 74% of the time? This raises some questions:

- 1.) Is the Army destroying these records every two years?
- 2.) Or is the Army refusing to make these records available to the preparers of this report?

RESPONSES TO COMMENT T

USE-T031

USE-T031: You are correct in your concerns about record keeping on range use of the withdrawal lands. U.S. Army Alaska recognizes the inconsistencies in its record keeping on range use at Fort Wainwright and will correct that situation.

Non-dud ammunition records are kept for an indefinite period with other range statistics. Records on dud-producing expenditures are kept permanently per Army regulation. U.S. Army Alaska provided two years of Range Data for the Yukon Training Area to the preparers of this LEIS. Impacts of continued military use of the withdrawal lands were assessed based on available records and reasonable assumptions concerning munition expenditures.

All munition records, except those subject to security concerns, are available to the public upon proper request.

3.) Is the Army deliberately failing to record the munitions expenditure information 74% of the time? If not, how does the Army explain a 74% failure rate?

4.) How can the impact of continued and expanded bombing activities be assessed unless the Army will disclose what types of munitions they are shooting into Alaska's public lands, and in what quantities?

5.) How can we ever hope to clean up what are, essentially, live minefields if munitions records are not established and maintained?

The Army should be required to provide what records they have regarding munitions expended on the ranges. And that information should be used in the LEIS to assess the adverse impact to public lands of the proposed action. That is what the law requires.

And, as would be obvious to anyone who valued the environmental health of Alaska public lands, the Army should be required to maintain permanent records of quantities and types of munitions expended.

Socioeconomics

Fires

The "Socioeconomics" section should deal with the economic costs of fires that are caused by bombing or that cannot be fought because of possible unexploded ordnance in the area.

- 1.) What is the dollar cost to fight these fires?
- 2.) What is the cost when fires cannot be fought because of the presence of unexploded ordnance?
3. What is the cost in lost resources such as:
 - a) the loss of commercially valuable timber?
 - b) the loss of wildlife habitat?
 - c) the loss of traplines?
 - d) the loss of recreational use?
 - e) the loss of scenic values relating to the area's earning power as a tourist destination?

A proper socioeconomic analysis will attempt to assign a value to these losses for past fires influenced by military activities. A cursory examination reveals substantial costs not addressed by the LEIS:

100 Mile Creek Fire

In June of 1996, military bombing started a fire on the Oklahoma bombing range. Because of the presence of unexploded ordnance there, the 100 Mile

USE-T031 cont.

SOC-T008 and T009: Please refer to Appendix 3.19.D for information on the dollar cost to fight fires on the withdrawal lands.

Loss of Wildlife Habitat

According to Bruce Dale of the Alaska Department of Fish and Game, wildlife populations are suffering from fire suppression rather than excessive fire. Animals are adapted to different stages of vegetation development. The mature black spruce forest does not support the vegetative diversity that a patchwork of burns does. The burns on withdrawal lands have provided forage for moose.

Traplines, Recreational Use, and Tourism

The Alaska Trappers' Association, the Snow Travelers' Association, and the Airboater's Association were contacted regarding the withdrawals. Military fires were not mentioned as a concern. The central concern for nonmilitary users was access. The Alaska Visitors' Association was also contacted, and could offer no data or opinion on tourism losses from military fires.

The survey of military personnel (Appendix 3.19.C) clearly indicates that tourism is increased because of the military presence. Thus, a significant amount of tourism in the Delta area will be lost as troops are moved to Fairbanks. They will receive their visitors in Fairbanks instead of Delta.

SOC-T008

Timber

The last 50 years experience does not show losses of commercial timber on State lands to be an issue. The Carla Lake fire would serve as an example where potentially a significant amount of commercially valuable timber could have burned. The Federal government is ordinarily liable for activities which cause losses to commercially valuable timber. This is a mitigation issue.

The Draft LEIS indicated the State harvests a very small fraction of the allowable cut. Recent opposition to State timber sales in interior Alaska serves to demonstrate that were the withdrawal lands of commercial timber quality, very little would in fact be sold.

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

DIVISION OF WILDLIFE CONSERVATION

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TONY KNOWLES, GOVERNOR

P.O. Box 605
Delta Junction, AK 99/37
PHONE: (907) 895-4484
FAX: (907) 895-4833
EMAIL: sdubois @
fishgame.state.ak.us

January 25, 1999

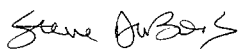
Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Dear Ms. Herdrich:

I would like to make the following comments about the Draft Legislative Environmental Impact Statement for the Alaska Army Lands Withdrawal Renewal.

1. I have attached copies of Fort Greely maps 3.12.c, 3.12.d, 3.12.f, and 3.12.g and corrected the range distribution illustrated for grizzly bear, moose, caribou, and bison respectively.
2. The EIS appears to subdivide the Lakes impact area into several new impact areas. Contaminating additional acreage with munitions will prevent use of the area for on-the-ground wildlife management activities and hunting by the public. I am opposed to live weapon firing into any areas on Ft. Greely that are currently uncontaminated with ordinance.
3. The prolonged 50 year duration of this land withdrawal makes it hard to comment on the impacts of the withdrawal for wildlife species that utilize early successional vegetative stages, such as moose and bison. The habitat for these species may change dramatically during the 50 year life of this withdrawal. Therefore, comments that are pertinent currently, could be significantly outdated and irrelevant before this plan expires, and important habitat areas may develop without being covered in the plan.
4. It is also difficult to comment on this EIS from the wildlife perspective without the Army's 1998-2002 Draft Integrated Natural Resources Management Plan for Ft. Greely being finalized.

Sincerely,



Steve DuBois
Wildlife Biologist

RESPONSES TO COMMENT S

WILD-S001: The range distribution information has been added to the maps. See additions to Figure 3.12.c Sensitive Grizzly Bear Habitat, Figure 3.12.d Sensitive Moose Habitat, Figure 3.12.f Sensitive Caribou Habitat, Figure 3.12.g Sensitive Bison Habitat.

WILD-S001

USE-S030: This LEIS is not proposing to create new Impact Areas on Fort Greely or change the use of existing Impact Areas. The Kansas, Arizona, Nevada, Oregon, and Michigan Lakes Impact Areas (see Figure 2.c) are designated as Impact Areas. All are used for limited periods and are normally used for non-dud producing ammunition or explosives, which are cleared and returned to other training support purposes following termination of firing. This use of the Lakes Impact Areas will continue through the proposed withdrawal renewal.

USE-S030

WILD-S002: This Environmental Impact Statement (EIS) is not intended to be a management plan for wildlife or any other resource. The Cooperative Agreement for Management of Fish and Wildlife Resources on Army Lands in Alaska, the Integrated Natural Resources Management Plans, required by the Sikes Act (16 USC 670a et seq.), and the Delta Bison Management Plan, are the documents governing wildlife management. The EIS does present mitigation for wildlife resources. The mitigation is in Chapters 4.12, 4.13, 4.14, and 4.23. The proposed mitigation includes the need for review of the Cooperative Agreement so changes can be made for management of wildlife species.

WILD-S002

WILD-S003

WILD-S003: The sensitive wildlife habitat maps within the LEIS give the latest information from the Alaska Fish and Game biologists. This information has been added to the Integrated Natural Resources Management Plan, which will assist in the analysis of wildlife impacts.

Creek Fire was left to burn unchecked until it moved off the bombing range and threatened structures on state land. Ultimately, it burned 64,000 acres. The BLM has stated that \$661,000 of public money was spent to fight this fire.

Carla Lake Fire

Last year \$15 million of public money was spent to suppress the Carla Lake Fire. It was started by lightning on the bombing range, then grew substantially when fire crews were pulled off the job. The crews had to retreat after encountering an unexploded mortar round near their camp, which was outside the bombing range buffer zone. \$15 million dollars of public money seems an amount that ought to have been noticed by the Army in preparing a report that so carefully notes the economic *benefits* of bombing.

Hajdukovich Fire

Crews were also pulled off the 1994 Hajdukovich Fire in the Gerstle River Test Site area because it burned on to land that had been used by the military to test nerve gas munitions. Neither the BLM nor the State of Alaska would allow its crews into the area for fear of unexploded nerve gas rounds going off. It was a fire where the deployment of ground forces may have made a big difference, according to BLM. As it was, \$3 million of public money was expended in the effort.

Charley River Fire

In the early 1990's, a fire caused by flares dropped over the upper Charley River in the Yukon-Charley Rivers National Preserve burned 35,000 acres. A man I met who had been trapping that area for twenty years found his trapline, and thus his livelihood, destroyed. Some reckoning of these obvious socioeconomic costs ought to be part of this analysis.

Crime

Also ignored in the LEIS is the fact that posting thousands of 18- to 20-something-year-old males to a community *will* have an effect on the crime rate. When when such a group of young men are all "fighting men," trained in the use of firearms, then the effect on the community's crime rate can be—and, in Fairbanks, probably is—significant. The LEIS fails to consider this socioeconomic impact, as required by law.

What is the social cost in criminal activity currently borne by the residents of the Fairbanks/Eielson area by virtue of the of the two military bases' proximity? Said another way, what proportion of crime in the Fairbanks/Eielson area is attributable to military personnel? If the proposed land withdrawal extension is denied and training activities are scaled back, by what amounts can residents of the area expect crime to drop? To answer these and other relevant questions, crime statistics from the bases should be gathered and related to crime statistics for the wider area.

Sincerely,



SOC-T009 SOC-T008 and T009 cont.:

Crime

There are no statistics to show that military personnel contribute significantly to crime. Military personnel should not be characterized as prone to drunken driving, larceny, and theft, any more than persons in mining, forestry, fishing, or the tourist service industries (whichever occupations are employed in alternative uses of the withdrawal lands). Fairbanks compares favorably with the rest of the United States as far as crime is concerned.

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Jules V. Tileston
4780 Cambridge Way
Anchorage, AK 99503

January 28, 1999

Cindy Hirter
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Subject: *Alaska Army Lands Withdrawal Renewal, Draft Legislative Environmental
Impact Statement (draft LEIS)*

Dear Ms. Hirter:

I have reviewed the draft LEIS proposing a 50-year extension of existing military withdrawals on about 871,500 acres of land near Fairbanks and Delta Junction, Alaska. The existing withdrawal expires on November 6, 2001. If Congress enacts legislation to implement the proposal, the withdrawal would next expire on November 6, 2051.

For the record, I have been in Alaska since 1972. I am a former Bureau of Land Management, Alaska Deputy State Director for Resources and most recently retired from the State of Alaska Department of Natural Resources as the Director, Division of Mining and Water Management.

During the public meeting in Anchorage on January 8, 1999 I inquired about the reason for the 50-year period, state selections, and consideration given to minerals. It is my understanding that:

- The 50-year period was selected primarily because that is about the same time the current withdrawals will have existed by the year 2001. It is further my understanding that there was no analysis showing how the military mission in Alaska would be in the intervening years.
- State selections cover the entire areas within the proposed 50-year extension of existing withdrawals.
- Minerals, except for mineral materials (sand and gravel) used by the Military were not now available. Therefore, no consideration was necessary.

I appreciate and generally support the role of the Military in Alaska. But I believe the draft LEIS is seriously, if not fatally flawed in its consideration of the three points above.

Withdrawal Time Frame and State Entitlements

The draft LEIS notes that the State of Alaska also has valid state selections for recreation minerals, wildlife, forestry, agriculture, and settlement values on these withdrawn lands. The draft LEIS did not consider the impact of delaying for 50 years the State of Alaska's opportunity to fulfill its Congressional entitlements under a variety of Federal Laws including the Alaska Statehood Act and the Alaska National Interest Conservation Lands Act. Setting aside the issue for the federal cost for eventually cleaning up the "High Hazard Impact Area" and "Impact Area Buffer" zones (hazard/buffer areas) shown in the existing withdrawals, there are significant acreages where other uses appear to be entirely compatible with Military use.

I am strongly opposed to an arbitrary and capricious 50-year postponement for the State of Alaska and through the State, local governments to have an opportunity to get their Congressionally approved entitlements. *Accordingly, I respectively recommend that the existing military withdrawals be for not more than 15 to 20 years.*

This much shorter period also recognizes the fact that the Military mission in Alaska has, and continues to, evolve significantly. During the past 15 to 20 years some withdrawn lands have been determined to no longer be needed for Military purposes and the State now has ownership. Only recently the base at Adak and at Delta Junction, Alaska have been declared unnecessary for the future Military mission. I do not intend to imply that 871,500 acres are now excess, or that they will be excess. However, the draft LEIS provides no meaningful way to evaluate the projected future Military mission in Alaska until the year 2051!

An alternative not adequately considered in the draft LEIS is the option of *transferring significant portions of the land outside the hazard/buffer areas to the State of Alaska for public recreation and mining with a proviso that the Military mission identified in the draft LEIS continues to be the superior use in accord with a land use plan jointly developed by the local Base Commander and the State.*

Consideration of Mineral Resources

The draft LEIS considered a single minerals alternative that can be paraphrased as "Open to the full operation of the federal mining and mineral leasing laws under the exclusive jurisdiction of the Bureau of Land Management." I agree that this alternative is appropriately discarded from detailed consideration. But the draft LEIS is seriously flawed because it neither considers, nor evaluates any other minerals alternative. The draft LEIS ignores the fact that P.L. 96-606 does provide for other uses and that other military bases have concurrent access to mineral resources.

The LEIS notes that there is little current information on the type, location, and prospective value of minerals within the 871,500 acres. The recent discovery of the Pogo deposit, the new Fort Knox Mine at Fairbanks and the Red Dog Mine near Kotzebue are current examples of how mineral

RESPONSES TO COMMENT U

ALT-U025: Refer to Chapters 1.2 and 2.1.3 for a discussion of the military's continuing need for the withdrawal lands.

The State of Alaska has top-filed on the military withdrawal lands; these top filings are not valid State selections. For comparison analysis in this LEIS, it was assumed the lands would be adjudicated to the State under the No Action Alternative. It is impossible to predict the likelihood these lands would be adjudicated to the State. At this time, the withdrawal lands top filings are not designated high priority selections by the State. However, the State updates its conveyance priorities annually, so the selection status could change.

The LEIS states that present military uses will continue for the duration of the withdrawal renewal. At any time during the withdrawal period, if the military determines the withdrawal lands or portions of the lands are excess, those lands will be relinquished to the Bureau of Land Management under the terms of the legislation which withdrew the lands. The Military Lands Withdrawal Act states the procedures the Army must follow to relinquish any or all of the withdrawal lands. Since the Army is not proposing to change the terms of the withdrawal in this renewal, the Army is recommending these requirements be included in the proposed renewal legislation.

The alternative of military use under State of Alaska ownership was not considered in this LEIS. The impacts of State ownership of the withdrawals are analyzed under the No Action Alternative.

MIN-U006: The commentor correctly states that mining is subject to stringent State and Federal environmental regulations, and the same point is made in the Draft LEIS (Chapter 4.5). Permits would not be issued for mining activities on any State or Federal lands without an assessment of potential impacts and mitigating measures.

The analysis of the No Action Alternative describes potential impacts if Congress does not grant the withdrawal renewals. The discussion is not provided to support the withdrawal renewals, but to provide a comparison of potential impacts under each alternative.

ALT-U025

MIN-U006

exploration and mining have changed in Alaska. Each of these new mines has also produced new or revised geologic theories on where economic mineral deposits are likely to be discovered since the original withdrawal of these lands 50 years ago. Comparing hazard/buffer zones shown in Figures 2.b through 2.e with mineral resources in Figures 3.4.a and .b and 3.5.a through 3.5.c shows there are significant potential economic mineral resource areas that are not in conflict with a live-fire Military mission.

The final LEIS should evaluate the experiences of other Military bases where exploration and production of mineral values are considered ok. That new minerals alternative should also be based on the fact that mining operations in Alaska are controlled by both federal mining and mineral leasing laws and by Alaska Mining Law. There are active partnerships between the State and Bureau of Land Management that provide for environmentally responsible mining operations that Governor Knowles describes as being "Open for Business" and "Doing It Right." That new minerals alternative also should make it clear that the appropriate Base Commander has the responsibility for determining what is or is not compatible with the Military missions described in the draft LEIS.

In order to determine whether there is likelihood of significant mineral resources on the withdrawn lands, the final LEIS and draft legislation should include a provision that the Military, Bureau of Land Management and Alaska Division of Geological and Geophysical Survey implement a *partnership to fund and conduct airborne geophysical surveys* and any necessary on-the-ground technical evaluation during the next 10 to 15 years. This will allow meaningful consideration about how mineral lands do or do not fit the Military mission 5 years prior to the expiration of the new withdrawals.

A valid State selection segregates the federal land selected from location and entry under federal mining, materials sale, and mineral leasing laws. Under Alaska mining law, a person may enter selected land and create by posting and notice a prospective future private mineral right. That future right is consummated only when two things happen:

(a) The State gets title to the land from the federal government [in this case when the military withdrawals expire, or if earlier when no longer needed for Military purposes] and

(b) The land has not otherwise been closed to mineral entry under State law. Mineral properties located under this provision may not be developed into operating mines and mineral exploration generally requires the specific approvals of both the State and Bureau of Land Management and in this case the local base commander.

The existing state selection, therefore, creates a dilemma that can only be solved in the federal legislation. There are at least three ways that the federal legislation can resolve this dilemma:

- *Except for the hazard/buffer areas and areas occupied by base facilities, transfer the existing withdrawal to State ownership with a Military mission being the superior land use.*

MIN-U006 cont. **MIN-U006 cont.:** Mineral development compatibility with Army uses has been evaluated by the military and the BLM on a case-by-case basis whether it is appropriate to open the withdrawal lands to the mining laws that do not conflict with the military mission.

An evaluation of other military lands in regard to mineral exploration and production is outside the scope of this LEIS.

The alternative of a military use under State ownership was not considered. The impacts of State ownership of the withdrawals are analyzed under the No Action Alternative. The State of Alaska has not identified these lands as a high enough conveyance priority for this alternative to have been evaluated.

The statement "if not done carefully" is omitted from the Final LEIS.

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- *Explicitly recognize the existing provision of State mining law to create prospective future private mineral property right with Bureau of Land Management, Base Commander, and State of Alaska controlling the on-the-ground mineral activity with due deference to the Military mission.*

MIN-U006
cont.

- *Explicitly recognize the existing state selection but permit entry and mining operations under Federal mining, materials sale, and mineral leasing laws with a provision that the federal mining claims be converted to state mining claims automatically when the land is transferred to State ownership.*

Finally, I strongly object to the assertion that "mining activities, if not done carefully, can destroy habitat and affect water quality" (draft LEIS page ES-7) as a reason to extend the existing Military withdrawals for 50 years. To suggest that mining under federal and state law and regulation would be done other than "carefully" when under the full requirements of both the Secretary of the Interior, Secretary of Defense and State of Alaska is inappropriate and should be *deleted* from the final LEIS.

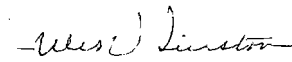
Summary

I generally support and appreciate the historic role of the Military mission in Alaska. The Mission, however, is changing rapidly and there is no substantive discussion about why the withdrawal should be extended until November 6, 2051. The adverse impacts to the State and local governments from not getting a timely opportunity to reduce outstanding land entitlements granted by Congress to Alaska have not been considered at all.

There are likely significant economic mineral deposits that are not located in the hazard/buffer areas that have not been given serious consideration. There are several federal legislative means to have both a continuing viable Military mission and an expanding viable, environmentally responsible mineral exploration and mining on substantial parts of the existing withdrawal. The Military, Bureau of Land Management and the State should develop an active partnership to update the 50-year old minerals data through airborne geophysical and associated on-the-ground documentation.

I would be pleased to provide any clarification to my comments and recommendations if you have questions.

Sincerely ,



Jules V. Tileston

cc Senator Stevens, Senator Murkowski, Congressman Young, Governor Knowles, Commissioner Shively, Alaska Miners Association

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Jules V. Tileston
4780 Cambridge Way
Anchorage, AK 99503

January 29, 1999

Ms. Cindy Hirter
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Subject: Supplemental Comments on the *Alaska Army Lands Withdrawal*,
Draft Legislative Environmental Impact Statement (draft LEIS)

Dear Ms Hirter,

Please include these supplemental comments to my comments dated January 28, 1999.

I just came across two documents that I believe require consideration in the Final LEIS:

- *Fort Greely--Proposed Resource Management Plan for the Fort Greely Maneuver Area and Fort Greely Air Drop Zone, Final Environmental Impact Statement, BLM/AK/PT/94/011-1600+080* prepared by the Department of the Interior, Bureau of Land Management, Steese/White Mountains District Office and the U.S. Army 6th Infantry Division (Light), dated 1994 and
- *Fort Wainwright, Yukon Maneuver Area--Proposed Resource Management Plan, Final Environmental Impact Statement, BLM/AK/PT/94/011-1600+080* prepared by the Department of the Interior, Bureau of Land Management, Steese/White Mountains District Office and the U.S. Army 6th Infantry Division (Light), dated 1994

Page 17 of the Fort Greely 1994 document considering minerals resources says:

"Proposed Action 22 The withdrawal area will remain closed to the operation of the Mining Law of 1872, the mineral Leasing Act of 1920 as amended, the Mineral Leasing Act for Acquired Lands of 1947, and the Geothermal Steam Act of 1970. Pursuant to Sec. 12(a) of the Military Lands Withdrawal Act, the Army and BLM, by 1996 and at least every five years thereafter, will jointly reconsider whether it would be appropriate to open portions of the withdrawal to the operation of the mineral laws." (Underlining and emphasis supplied)

Proposed Action 23 says that the land will remain closed to all form of mineral material disposal, both

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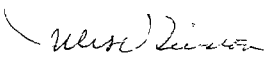
sale and free use, other than that which supports military activity. (pages 17 and 18)

Page 56 repeats the commitment to jointly "...reexamine what areas may be suitable for opening by 1996 and at least every five years thereafter." The 1994 document also says that no consideration was given to lode mining or coal development. The Pogo project and Fort Knox Mine and adjacent mineral properties such as the True North are lode deposits and therefore ignored in the 1996 joint Army/BLM finding? Also in 1994, the State of Alaska held a competitive coal lease sale in the Jarvis Creek Coal Field to the south of Delta Junction. Accordingly both lode and coal mines should be considered in the Final LEIS. The lode mines on the basis of existing mining activity in the vicinity of the two withdrawals and coal from the aspect of whether it could be used to generate power for a large mine operation.

Pages 16 and 46 of the Fort Wainwright 1994 document repeats the statements the Fort Greely document referenced above, except these are now Proposed Action 15 and Proposed Action 16, respectively.

The Final LEIS should discuss the findings about mineral compatibility promised in Proposed Action 22 and Proposed Action 15. In particular the joint Army/BLM finding and the extent, if any, new mineral information such as the True North and other mineral properties near the Fort Knox Mine and the exploration work at the Pogo mineral property were or were not considered. Also the Final LEIS should specifically show the rationale used by Army/BLM and the extent that mineral exploration and production were or were not compatible with the Military use outside the hazard/buffer areas shown in the 1998 LEIS. The Final LEIS should also present and discuss how the mineral compatible finding commitment will be completed for the five-year period 1996-2001. Finally, will the 1996-2001 minerals reconsideration be available for consideration prior to the introduction of legislation to extend the existing withdrawals, and if not, why?

Sincerely,


Jules V. Tileston

cc: Senator Stevens, Senator Murkowski, Congressman Young, Commissioner Shively, Alaska Miners Association

MIN-U007

MIN-U007: Mineral development compatibility with Army uses has been evaluated by the military and the BLM on a case-by-case basis whether it is appropriate to open the withdrawal lands to the mining laws that do not conflict with the military mission.

MIN-U008

MIN-U008: Changes have been made in Figures 3.4.a, 3.4.b, and 3.5.b to conservatively extend some of the geologic units beyond the withdrawal boundaries. The text in Chapter 3.5 has also been amended to include a discussion of current exploration for VMS mineralization in the Bonnifield District.

ALT-U026

ALT-U026: Mineral exploration has not been precluded by the withdrawal. All requests for mineral exploration have been considered on a case-by-case basis.

MIN-U009

MIN-U009: An evaluation of the compatibility of mineral development with Army uses during 1996-2001 is not within the scope of the LEIS because these lands are currently withdrawn until November 6, 2001. This LEIS proposes to renew the withdrawal beginning November 6, 2001.

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Ms. Cindy Herdich
Center for Ecological Management of Military Lands
Colorado State University,
Fort Collins, CO 80523-1500

U.S. Army Alaska Lands Withdrawal Renewal
Environmental Impact Statement

Steve Adams
P.O. Box 81814
Fairbanks, Alaska 99708-1814

I represent myself, my comments follow:

I have several concerns, but want to assure you that I fully support the mission of the U.S. Armed Forces, and want them to have whatever resources they need here in Alaska. I served in the U.S. Army at Fort Greely in the early '60's, so am familiar with the areas in question. I have a very deep concern for the fact that there seems to be no limit on what can take place on these lands, for 50 years if this is approved. No one, Military or civilian, should be granted that kind of license when polluting the environment!

1. It appears that the ranges are, and will continue to be under this plan, contaminated at will, with no restriction on the material to be dumped in there for 50 years.

2. It also appears that the areas of contamination will increase in size, and possibly substantially as newer and more destructive devices still in development are tested and deployed, again with no restriction on the materials used, or control of pollution for 50 years. It's not spelled out in the plan, and the Regulations referenced are. It appears, subject to change at the whim of the military.

3. No effort is currently being made to adequately address a clean up process, or in fact, if a clean up will ever be attempted. The referenced 5 year rotational range clean up is a "Police call" - pick up those cigarette butts" type action, that deals with only obvious, visible, surface contamination, removed by a number of servicemen walking in a line through the area.

4. Very troubling is the unanswered question in the LEIS as to whether or not it would even be possible - either financially or logistically - to clean up the ranges. Fairbanksans are well aware of the "Little guy" who was put out of business and bankrupted in Fairbanks in the not too distant past over an issue of soil contamination by

USE-V032

RESPONSES TO COMMENT V

USE-V032: See Chapter 2.1.3.5 Decontamination and Proposed Mitigation in Chapter 4.23.

USE-V033

USE-V033: This LEIS is not proposing to create new Impact Areas on Fort Greely or change the use of existing Impact Areas. The Kansas, Arizona, Nevada, Oregon, and Michigan Lakes Impact Areas (see Figure 2.c) are designated as Impact Areas. All are used for limited periods and are normally used for non-dud producing ammunition or explosives, which are cleared and returned to other training support purposes following termination of firing. This use of the Lakes Impact Areas will continue through the proposed withdrawal renewal. Also see Proposed Mitigation in Chapter 4.23.

MIT-V004

MIT-V004, V005, and V006: Please refer to response for POL-A002. Current decontamination efforts are described including an ordnance cleanup history by the Air Force (see Appendix 2.C).

MIT-V005

Cost and lack of unexploded ordnance characterization and evacuation technologies are two major impediments to efficient and effective clearance of unexploded ordnance. As technologies improve, the effectiveness of remediation should increase and the time, cost, and environmental impacts for remediation should decrease.

There are inherent risks associated with public access of military land. Public access is allowed, recognizing that the primary use of the land is for military use.

V

automotive batteries. No effort was made to allow him to continue contamination the soil for the next 50 years. he was expected to clean it up ! Do we have a different standard for the government/military ?

5. If public access and use is really to be encouraged on the lands in question, how can that be reconciled with the obvious fact there are no standards for clean up or the amount of pollutants allowed to accumulate ?

MIT-V006

MIT-V006: See previous page.

6. I am very disturbed by constantly finding in the study that there is no baseline data for pollution and contaminants. It's hard to believe that in all the years that these areas have been in use by the military, no studies have been done. Seems to me I can recall the President, the Army's Commander-in-Chief, ordering that all agencies of the Federal Government were to take the lead and set the example for being environmentally correct and responsible. No baseline studies ?

POL-V008

POL-V008: No baseline studies to assess the effects of munitions on soils, groundwater, vegetation, or wildlife have been completed for the withdrawal lands or the surrounding areas by the military or State and Federal agencies. The Army's proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

7. A quick look at Table 4.6.a Tire and Track Data for the most Common Military Vehicles used On Fort Wainwright Yukon Training Area and Fort Greely (Richmond in Blaisdell 1991) is most instructive. Thirteen of the 21 possible responses are listed as unavailable. Nobody knew, or bothered to try and find out, the width of a truck and it's contact area ? I would suggest that somebody could have made a trip (or a phone call) to any new truck dealer for at least some of the missing data.

SOIL-V002

SOIL-V002: Please refer to Table 4.6.a. Additional information has been added to this table.

8. The LEIS is woefully inadequate in addressing the danger of fire and fire suppression, especially in view of the Fort Greely realignment and closure and lack of personnel available to assist in preventing and controlling wildfire. It is interesting to note that the LEIS reports that "The majority of pollutants produced on Fort Greely result from forest fires.."

FIRE-V004

FIRE-V004: Fire Department personnel do not fight wildland fires. They are responsible for fires on the Main Post. The Bureau of Land Management, Alaska Fire Service is responsible for wildland fire suppression on the withdrawal lands. When fires on the withdrawal lands are called in, the Fire Department records coordinates, and then contacts the Bureau of Land Management, Alaska Fire Service (AFS). The ability of the Fire Department to record wildland fire locations will not change after the realignment. NEPA documents, including Environmental Assessments are being prepared to analyze the impacts of the realignment on Fort Wainwright and Fort Greely. The Environmental Assessment for Realignment of Personnel and Military Functions to Fort Wainwright was published in June 1997. It is anticipated the Environmental Assessment for Realignment of Personnel and Military Functions from Fort Greely will be published in October 1999.

9. The LEIS does not address, as it probably cannot, the air quality issues that may arise as the result of weaponry now in development. This again raises the issue of the long term withdrawal requested, and calls to question how and when those issues could/would be addressed, certainly not after 50 years ?

AIR-V001

AIR-V001: Military activities conducted on the withdrawal lands are expected to be consistent with those conducted during the past 15 years. A description of these activities can be found in Chapter 2.1.3. The Army is proposing to renew the withdrawal areas with the existing military land uses. Fielding of future military weapon systems would require appropriate NEPA documentation. Chapter 4.2 Climate and Chapter 4.23 Existing and Proposed Mitigation discuss air quality mitigation measures currently used by the military on withdrawal lands.

10. In the Issues section of the LEIS there are 2 issues that are blown off with the statement that "This issue will not be resolved in this LEIS." I can see where Access might well not be, however, under Submerged Lands there are 2 issues:

a. Impacts on water quality of submerged lands (property below the high mean water mark) due to military use, and

LAND-V002

LAND-V002 and V003: The jurisdiction of submerged lands on the withdrawal properties will not be resolved in this LEIS. The State of Alaska, Department of Natural Resources, Division of Land, has indicated interest in the Delta River, including an ownership interest in the lands submerged under the Delta River. U.S. Army Alaska is reviewing the Division of Land's ownership claim. The Division of Land has also requested cleanup of the Delta River. U.S. Army Alaska has noted that training uses of the area will continue.

b. Jurisdiction of submerged lands on the withdrawal properties, particularly the Delta River.

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It would appear that nobody wants to be responsible for anything. Does it matter who has jurisdiction under (b) in determining the impact on water quality? At best it could be argued that one or another agency might have stricter standards than the other, but should not there be at least an enforceable minimum. Where is the impact on water quality to be addressed? Must the Congress of the United States make a decision on this matter with the number of unanswered questions that exist?

11. The LEIS states (4.6) "The environmental standards against which off-road vehicle disturbances and the extent of munitions damage are measured have not yet been adequately defined for the Fort Wainwright Yukon Training Area and Fort Greely." It goes on to say that a general rating scheme was presented in 1974 - that was 22 years ago! Has there been no effort since then to assess this issue? This is another area that seems to have been "blown off" by the Military and those who developed the LEIS. Is the end result to be that in 50 years the same 1974 scheme will rule the day? It is further stated that, "The majority of military activities conducted on Fort Wainwright Yukon Training Area involve off-road Maneuvering, which accounts for the majority of soil damage on the training areas. Who is to be accountable, and when will this ever happen, given the cavalier approach to this and many other issues in the LEIS?"

12. The LEIS states that, "The extent of soil contamination by ammunition has not yet been determined at Fort Wainwright Yukon Training Area and Fort Greely." This after how many years? Does "Not yet" infer that a determination is forthcoming? What affect will that have during the 50 year license to contaminate that is being requested? Any appeal if a hazard is found to exist?

13. "A baseline munitions study has not been completed for Fort Wainwright Yukon Training Area." Why not? Is it thought that one is not needed? How will it ever be determined whether or not there is serious environmental impact if we do not have a starting point for making that determination. I would hope that is not the answer as to why there has been no study!

14. There are several areas in the LEIS where you can find a statement to the effect that, "in the event of negatively impacted (you pick what) _____, the impact would be identified and monitored, and areas restored when feasible (emphasis added). I found nowhere in the LEIS a definition of "when feasible", no agency or individual listed as being

LAND-V003

LAND-V002 and V003 cont.: Please refer to Executive Summary and Chapter 1.8. Additional information regarding water quality and the jurisdiction of submerged lands has been added to these sections. Chapter 3.1.1 and Chapter 4.1 describes submerged lands and their relation to land use. Chapter 4.8.2 describes the issue of water quality, monitoring, and decontamination of submerged lands.

Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

SOIL-V003

SOIL-V003: The intent of the soil damage rating scheme as presented in Chapter 4.6 was to serve as a general evaluation tool to assess the impacts of off-road maneuvering and munitions damage to the withdrawal lands. This particular rating scheme was chosen because (1) the military has not developed a soil disturbance rating scheme specific to the withdrawal lands, and (2) it was developed based on field tests and observations of off-road vehicular traffic on Arctic tundra in Alaska. This rating scheme is not included in the management of soils or permafrost on the withdrawal lands and was only used as an analysis tool within this LEIS.

Please refer to Appendix 2.D for a description of the current natural resources management programs for the withdrawal areas.

SOIL-V004

SOIL-V004: Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

MIT-V007

MIT-V007: Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

OTH-V009

OTH-V009: Military activities including restoration are conducted when funding, technology, priorities, and time permit.

Please refer to Appendix 2.D for a description of the current natural resources management programs for the withdrawal areas.

V

responsible for restoration, or to what degree restoration would be accomplished.

I'm concerned that throughout the LEIS are statements that ignore or gloss over issues that, were they contained in a non-military LEIS, would stop any such project in its tracks (no pun intended).

15. Chapter after chapter, page after page, the LEIS states that some adverse impacts have or can be assessed using baseline studies either at Greely or Wainwright, but not both, and I have to ask, why not? Water is as important an issue on both areas, soils are also, etc. An example is on page 4-27 regarding water: Ft. Greely had a baseline munitions study; Ft. Wainwright did not; data has not been collected regarding damage caused by the Air Force at Stuart Creek and Oklahoma/Delta Creek impact areas....

16. I read time after time that "damage control steps are included in training plans....", range regulations, etc. Seems to me that this is a case of the fox guarding the hen house. I have to question why the Army has to fill and level foxholes when the Air Force can bomb with abandon, ignoring their bomb craters, etc.?

Does the public have full access to the training plans, range regulations, etc. so they can be evaluated and concerns addressed?

17. Preferred Alternative: Retention of the lands by U.S. Army Alaska would have some negative effects...."

Under the No Action Alternative, in most cases, "Land uses would be subject to local, State and Federal Regulations and would involve specific planning procedures. (Emphasis added).

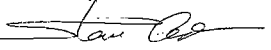
State and local governments have to provide specific planning, but Federal Government does not?

18. There should be a shorter time frame for the withdrawal so as to be able to review where we are 5 to 10 years down the road and deal with what then is the current status of weaponry and training needs. The fact that a 50 year renewal would match the current time of use is hardly a valid reason for repeating what may have been 50 years worth of mistakes.

I could go on but enough trees have already been used in the process of getting us to this point. The above are just one man's observations and opinions, but they are serious concerns to this one man.

Again, I fully support the military in Alaska and the rest of the United States. I also support the rights and well being of all its inhabitants, and put environmental issues at or near the top of my concerns list. I sincerely hope that my observations will be taken as seriously as they were written, and not blown off with some bureaucratic babbling about the flag, motherhood and apple pie as is often shoved down our throats when valid concerns are raised over the workings of government and the future of the earth. There is only one earth, and as past misdeeds have shown, even if they have been for the most part ignored, we oftentimes only get one chance to do it right. Let's do this one right.

Sincerely,


Steve Adams
P.O. Box 81814
Fairbanks, Alaska 99708-1814

CC: Senator Stevens
Senator Murkowski
Representative Young

POL-V009

POL-V009: Baseline studies have not been conducted for all resources at Fort Wainwright and Fort Greely. All existing baseline studies for resources studied at both installations are included in the LEIS. Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources as outlined in Chapter 4.23.

MIT-V008

MIT-V008: The Army and the Air Force have specific regulations regarding training and its impacts, including bombing. Craters from bombing are expected to result in the High Hazard Impact Areas. The Army digs foxholes in Training Areas, not impact Areas. Training Areas are accessible by soldiers and the public, and are maintained under management guidelines for those specific areas. Impact Areas are managed differently due to the unexploded ordnance hazard.

USE-V034

USE-V034: The U.S. Army Alaska Range Regulation (350-2) is a safety and procedure regulation for the Alaska Ranges. It is unclassified and available. The Army develops its training plans to comply with AR350-2.

ALT-V027

ALT-V027: U.S. Army Alaska is required to follow applicable Federal, State, and local laws and regulations. See Chapter 1.10.3 and the individual resource sections in Chapters 3 and 4 for pertinent laws and regulations.

ALT-V028

ALT-V028: The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

Periodic review of the Army's use and management of the withdrawal lands would occur under the Preferred Alternative. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. Plans are written for a five year period with public, Federal and State agency participation in the development and review process.

W

Whit Hicks
P.O. Box 1417
Delta Jct., AK 99737

Center for Ecological Management of Military Lands
Colorado State University
Fort Collins, CO 80523-1500

February 3, 1999

Dear Ms. Herdrich,

I oppose the 50 year withdrawal by the Department of Defense (DOD) of the Delta East and Delta West training areas. I have the several concerns and therefore, will offer suggestions to remedy the perceived problems.

Concerns:

- (1) Fifty years is too long to withdraw land from any other possible use. The base realignment of Fort Greely will devastate the local economy for years to come. In order to pursue potential alternatives to DOD use of this land mass, the community should have the opportunity to reconsider the land withdrawal after a shorter period of time.
- (2) Environmental remediation and clean-up has been irresponsible and negligent. The Little Delta river is an important part of the salmon ecosystem, as is the entire impact area in the Delta West training area. There has been unlawful road construction through wetlands, dumping in the flood plain of the Little Delta river, and stream crossings made with heavy equipment.
- (3) Insufficient geophysical and geological data have been collected within the proposed withdrawal area. Potential mineral and non-mineral resources are not accurately identified and no proper assessment of value has been ascertained.
- (4) No terms for compensation for use of the land to the local community (Delta region is 80% outside of the City of Delta Junction) has been negotiated with the community members.
- (5) There is unnecessary withdrawal of land. The size of the land withdrawal is excessive. Buffer zones are necessary; however, much of the land proposed for withdrawal need not be withdrawn for the proposed uses.

Suggestions for solutions:

- (1) Reduce the withdrawal proposal to 10 years, at which time the the public can

RESPONSES TO COMMENT W

ALT-W029: Noted. Thank you for your comments.

MIT-W009: Training exercises conducted on Alaska military lands are regulated by USARAK Range Regulation 350-2. All actions undertaken by the U.S. Army are required to consider their impact to the surrounding environment and to take certain precautions to avoid impact. These include the refilling and leveling of any foxholes, trench systems, tank traps, hulldown positions, or explosive excavations; conducting vehicular stream crossings in designated areas only; limiting cross-country vehicular travel to established roads and dry trails during spring thaw; and avoiding cross-country movement in creek bottoms, marshes, and moist tundra areas during summer months. By limiting these activities, the chance of erosion occurring and subsequent sedimentation leading to poor water quality will be lessened. There have been isolated instances where Range Regulation 350-2 has not been satisfied. However, remediation has been implemented as mandated.

ALT-W029

In addition to these environmental considerations, damage control steps are also included within individual training plans to minimize natural resources damage. These steps include the protection of known sensitive areas, repair of unavoidable maneuver damage, coordination and permitting of any ground disturbing activities, and scheduling of natural resources and hazardous material inspections of training areas to ensure regulation compliance. Fort Greely and Fort Wainwright Integrated Natural Resources Management Plans are being developed to ensure land stewardship and environmental protection.

MIT-W009

MIN-W010

Please refer to Appendix 2.D for a description of the current natural resources management programs for the withdrawal areas.

SOC-W010

ALT-W030

Impacts to wetlands are regulated by various Army, Federal, and State laws. The Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act require permits before construction work using mechanized equipment occurs, in order to maintain wetland integrity. Section 10 of the Rivers and Harbors Act requires permits prior to commencing any work or building of structures in navigable water of the United States. Such work includes dredging and bank stabilization. Section 404 permits are required for the discharge of dredged or fill material into a water of the United States, including wetlands. These permits usually contain special provisions which require the permittee to maintain natural drainage patterns to prevent flooding or excessive drainage of nearby wetlands, stabilize construction

ALT-W031

areas to prevent erosion, prevent encroachment upon adjacent wetlands, and implement a plan to avoid future disturbance and reestablish vegetation when such disturbance cannot be avoided.

The Army received a permit from February 1, 1984 to November 1988 to operate a landfill at the edge of the Delta Creek Assault Strip, which is located in the floodplain of Delta Creek. All combustibles were burned prior to burial. The landfill was primarily used for training debris disposal, including human waste, packaging, and daily use items during large training exercises. Targets are placed on gravel bars no less than 50 feet from flowing water in the Delta River and Delta Creek, and during clean-up, the debris is removed from the riverbeds and not buried within the floodplain.

MIN-W010: Conducting an evaluation of the mineral potential, including airborne geophysical surveys is not a requirement for the military use of these withdrawal lands.

SOC-W010: Noted. This is outside the scope of this LEIS.

ALT-W030: See Chapter 2 for a discussion of military use of the withdrawal lands and Military Operational Parameters.

ALT-W031: Noted. Refer to Chapters 1.2 and 2.1.3 for a discussion of the military's continuing need for the withdrawal lands.

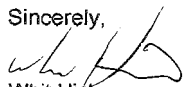
W

review the activities by DOD over the past ten years and negotiate terms for extending the withdrawal for the next ten years.

- (2) Develop and implement an environmental cleanup plan for the withdrawal area. Before any further withdrawal agreements are approved by the people of the United States, the DOD should develop a plan to cleanup and remediate all impacts to the area that occur as a result of training activities during the withdrawal period. Even more important to the environment and the citizens of the region, is the need to cleanup and remediate impacts that have already occurred. DOD should designate 20% of its Alaska training budget to cleanup and remediation of its training areas. Before the withdrawal, the DOD should negotiate with the local communities, a reasonable amount of cleanup and remediation and at the end of the next ten year withdrawal, DOD must present the accomplishments before further withdrawal is granted.
- (3) There is insufficient geophysical and geological data available in the proposed withdrawal areas. DOD should fund a thorough geological and geophysical survey using the best modern technology available with the USGS to determine the resource base within the withdrawal areas. Since this potential revenue will be withdrawn from the local communities revenue base DOD should compensate the region for its value.
- (4) DOD should come to the table with the entire surrounding community to discuss fair and legal compensation for the use of this massive land area. The City of Delta Junction represents only about 25% of the local population. The greater community is in the process of forming a borough which will encompass the entire Delta East and West withdrawal areas. DOD representatives should come to the table with the borough planning committee before and withdrawal plans are finalized.
- (5) "It has always been withdrawn" is not a reasonable justification for tying up land that is not needed for military training. Some of the land being requested for withdrawal need not be withdrawn to accomplish the military training objectives. For example, most of the land east of Jarvis Creek, excluding the drop zones should be reclaimed and returned to the state for management. Other areas should also be examined to determine if they are critical to military training.

I believe my concerns are valid and represent many, if not most of the local residents in our community. I will share my concerns with as many other agencies and individuals as I possibly can. Please help this community to have a voice that can not be ignored. We have the most at stake.

Sincerely,



Whit Hicks

MIT-W010

MIT-W010: Please refer to responses for POL-A001 and POL-A002. Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources (see Chapter 4.23).

MIN-W011

MIN-W011: Conducting an evaluation of the mineral potential, including airborne geophysical surveys is not a requirement for the military use of these withdrawal lands.

SOC-W011

SOC-W011: Noted. This is outside the scope of this LEIS.

ALT-W032

ALT-W032: See Chapter 2 for a discussion of military use of the withdrawal lands and Military Operational Parameters.

X

STATE OF ALASKA

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

TONY KNOWLES, GOVERNOR

☒ **SOUTHCENTRAL REGIONAL OFFICE**
3601 "C" STREET, SUITE 370
ANCHORAGE, ALASKA 99503-5930
PH: (907) 269-7470/FAX: (907) 561-6134

☐ **CENTRAL OFFICE**
P.O. BOX 110030
JUNEAU, ALASKA 99811-0030
PH: (907) 465-3562/FAX: (907) 465-3075

☐ **PIPELINE COORDINATOR'S OFFICE**
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 271-4317/FAX: (907) 272-0690

February 4, 1999

Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523-1500

Dear Ms. Herdrich,

RE: Alaska Army Lands Withdrawal Renewal Draft LEIS

The State of Alaska resource agencies have reviewed the above referenced document. We offer the following comments.

As stated in comments submitted by the Alaska Department on Natural Resources (DNR) during the scoping phase of this process (letter from DNR Commissioner Shively to you dated January 23, 1998), we are concerned about the continuing military withdrawal status of lands within the boundaries of Chena River State Recreation Area. DNR expressed numerous reasons for supporting the eventual transfer of these lands from federal ownership to state ownership. In the draft LEIS, a strong argument is made for the military's continuing use of these lands (known as Beaver Creek-South Fork of the Chena area) in the Yukon Training Area. Therefore, we will not encourage use or development of this area until it is no longer of such critical need for military purposes. However, we believe we have communicated a clear need for these lands for recreation use and we continue to desire transfer to state ownership at some appropriate time in the future, after the area is cleaned up as necessary. We appreciate your continued designation of the area as a Prohibited Tactical Training Area (PTTA), so presumably the amount of contamination will be minimized.

Perhaps more importantly, however, we strongly believe an extension of the lease from BLM to the Army for a 50 year duration is much too long. Land use patterns can change dramatically in relatively short periods of time, and it may be desirable to revise public policy decisions to respond to those changes. We request that the timeline for review of the land lease renewal remain, as it has been, at 15 years. A full EIS may not be required at that

RESPONSES FOR COMMENT X

ALT-X033: Noted. Thank you for your comments.

ALT-X033

ALT-X034: The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ALT-X034

Periodic review of the Army's use and management of the withdrawal lands would occur under the Preferred Alternative. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. Plans are written for a five year period with public, Federal and State agency participation in the development and review process.

X

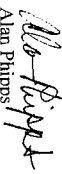
February 4, 1999
Page 2

time, but perhaps an assessment of what factors may be significantly different and worthy of discussion, i.e., a withdrawal "update", may be appropriate.

Additionally, we are available to work together, at the local level, to address some concerns that have arisen through this draft LEIS process. These concerns include how, or when, the PTTA can be available for public use, and how the area can be properly posted.

Thank you for the opportunity to comment. By reference, please include as part of our comments the letter from Steve Dubois, Wildlife Biologist, Alaska Department of Fish and Game, to you dated January 25, 1999. Please do not hesitate to contact me if you need additional information or discussion.

Sincerely,



Alan Philips
Project Review Coordinator

cc: John Katz, Governor's Office, Washington D.C.

John Sisk, Governor's Office, Juneau

Gabrielle La Rouché, Acting Director, Division of Governmental Coordination

John Shively, Commissioner, Department of Natural Resources

Frank Rue, Commissioner, Department of Fish and Game

Joseph Perkins, Commissioner, Department of Transportation and Public
Facilities

Michele Brown, Commissioner, Department of Environmental Conservation

Debby Sedwick, Commissioner, Department Of Commerce and Economic
Development

ACC-X013

ACC-X013: This area is part of the Yukon Training Area and subject to the same access and use restrictions as other lands not permanently closed. This area is open to the public according to military training and scheduling.

January 31, 1999

Y

Cindy Herdrich
Center for Ecological Mgmt of Military Lands
Vocational Education Bldg
Colorado State University
Ft. Collins, CO 80523

Dear Ms. Herdrich;

The following are a list of questions I have concerning the requested 50 year lease of the training areas in Alaska noted below:

248,000 acre Yukon Training Range near Ft. Wainwright
660,000 acre training area near Ft. Greely

1. Why 50 years? Why not 5 years or 10?
2. Do we know what kind of weaponry will be tested on this land in 50 years? Do we even know what kind of weaponry will be tested in 5 years? Do we know that 5 or 10 years, or 20 years from now biological weaponry won't be tested on this land? The military has used the civilian population as test subjects in the past without their knowledge. What is to stop them from doing it again? At least, with a shorter lease, the actions of the test personnel would be subject to review every few years rather than giving them a free hand for almost a lifetime.
3. How can we sign control of such a vast area away, not knowing how it will be used? Will there be danger to the people living around it? Wouldn't a 5 year lease give the state more control over how the land is used?
4. Why can't there be a corridor on either side of the rivers and streams? I have seen munitions stored in the river bottoms below high water lines and blown up there, releasing who knows what into the water shed.
5. Why is it necessary to remove basic hunting camps from these areas? I am speaking of basic tent frames, etc. Hunting, trapping and fishing are allowed, if a person is willing to sit through a training film and sign a statement releasing the army from liability. What can a few small camps which are used only during hunting season possibly hurt? The effect on such a vast area of 40-50 little camps seems miniscule.
6. Why is it necessary for training in the field to take place in the month of September? The vast majority of civilian use would be during this month. It seems that there must be maintenance of weaponry or equipment that could be taught during that time.

I understand that the military needs this land to train. I don't dispute this fact. My argument is with the time. 50 years is too

RESPONSES TO COMMENT Y

ALT-Y035: The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

USE-Y035: Military weaponry development evolves with technology. The need for testing and training of Army and Air Force personnel will continue in the future. The withdrawal legislation authorizes the military use the lands for training and testing. Any withdrawal renewal term will authorize military weaponry testing. Changes to the military's mission in Alaska would require appropriate NEPA documentation.

The Army's use and management of the withdrawal lands will periodically be reviewed during the withdrawal renewal period. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. These plans are written for a five year period with public, and Federal and State agency participation in their development.

See Chapter 4.23 for existing and proposed mitigation.

USE-Y036: Under the Preferred Alternative, the withdrawal lands will remain in Federal ownership. This LEIS describes the military's use of the withdrawal lands in Chapter 2.1.3. The Integrated Natural Resources Management Plans, which the Army is completing for Fort Wainwright and Fort Greely, describe the management, rehabilitation, and restoration the military will prescribe on the withdrawal lands. The Plans cover a five year term and their development is coordinated with State and Federal resource agencies, and the public. When the Plans expire, they are reviewed, updated, and approved under the same process for an additional five year term.

WATER-Y004: Targets are placed on gravel bars no less than 50 feet from flowing water in the Delta River and Delta Creek. During clean-up, debris is removed from the riverbeds and not buried within the floodplain. Remediation efforts have been proposed and are described in Chapter 4.23.

ACC-Y014: Under the Military Lands Withdrawal Act, the military lands are withdrawn from all forms of appropriation under the public land laws, except where the land is subject to valid existing rights. Trespass structures constructed on the withdrawal lands are illegal. U.S. Army Alaska does not authorize trespass structures on the its lands.

USE-Y037: Historically, September has been utilized for range maintenance. The military utilizes this period for annual Impact Area decontamination and target maintenance. To date, it has not resulted in the training lands being closed to the public. Please contact the Military Police to obtain access to military lands.

ALT-Y036: Noted. Thank you for your comments.

ALT-Y035

USE-Y035

USE-Y036

WATER-Y004

ACC-Y014

USE-Y037

ALT-Y036

Y

long to lock up land without some kind of review by the public. We live here. We are being adversely affected by the impending closure of the Ft. Greely Army post. The ability to hunt and make use of the land near Delta Junction will become more important than it already is as family incomes take a hit from loss of jobs and the need to hunt for food for the table becomes vital to a family's existence. For many people, hunting is a way of life and as incomes decrease, traveling to distant areas to hunt will become difficult, if not impossible. The ability to hunt in these areas, with hunting camps as an aid will become more and more important to a family's livelihood and I can see no harm coming from their existence.

I will be interested to hear from you concerning the answers to these questions.

Sincerely,

Earl F. Malcolm

cc:
Rep. Don Young
Sen. Frank Murkowski
Sen. Ted Stevens
Gov. Tony Knowles

REC-Y005

REC-Y005: The primary use of the withdrawn lands is for military purposes. The Army allows hunting in areas that are safe for the public and do not interfere with military activities. Delta Junction is surrounded by State land where hunting is allowed.

Z

US Army Alaska Land Withdrawal Renewal EIS

Comments 4/22/99 2/5/99
June Thomasson, representing self
3175 Chinook Drive
Fairbanks, AK 99709

- 1) The EIS should be approved for ten years only. The population of Fairbanks is continuing to grow, not only as a result of military changes. This will place increasing stress on surrounding areas used not only for residences but especially for recreation. Needs of the boroughs with respect to military lands deserve review every ten years. Also, environmental/ecological knowledge and technology are rapidly changing; more frequent review will facilitate utilization of the latest expertise.
- 2) No additional areas of contamination should be allowed. To declare areas unsalvageable is dangerous to human and ecological health; to expand such areas is unthinkable in this era of increasing awareness of the pervasive spread and effects of toxins. Again, increasing populations increase the risk for damage.
- 3) Re: 2.3.3 Beaver Creek - South Fork of the Chena River
This area should be relinquished to the State of Alaska, Division of Parks, as established by the legislature years ago. With the growing population of the Fairbanks area (which includes increasing military), the Chena State Recreation Area is heavily used. Military flights decrease the quality of the recreational or tourist experience, and harass wildlife. Restoring this area will help mitigate the effects of increasing human population.
- 4) Consider shared use of air training areas over Yukon Flats Training Area.

June Thomasson

RESPONSES TO COMMENT Z

ALT-Z037 **ALT-Z037:** Noted. Thank you for your comments.

USE-Z038 **USE-Z038:** No expansion or addition of Impact Areas would occur under the Preferred Alternative. U.S. Army Alaska policy states that new contaminated Impact Areas will not be created on withdrawal lands without approval per Army regulations and the Bureau of Land Management (AR350-2) and applicable Federal laws, including the National Environmental Policy Act.

ALT-Z038 **ALT-Z038:** Military use of the Yukon Training Area started in 1956. In 1975 the Alaska State Legislature designated the boundaries of the Chena River State Recreation Area, which includes a portion of Yukon Training Area land referred to as the Beaver Creek-South Fork Area. This State action did not transfer title of the land nor was it supported by Federal agencies. At this time, the State has not designated these lands as high priority for conveyance.

ACC-Z015

The Army and Air Force considered an alternative to relinquish this portion of the Yukon Training Area (see Chapter 2.3.3) to Alaska State Parks, but eliminated it from further study due to the excessive impacts to military training and the importance of this area's training infrastructure in achieving combat readiness.

Also see the letter from the State of Alaska (comment letter X in this section) dated February 4, 1999 received during the comment period on this LEIS.

ACC-Z015: All areas covered by Military Operations Areas (MOAs) are open to civilian pilots flying under Visual Flight Rules (VFRs). Restricted Areas are closed to civilian aviation during periods of scheduled activity. Civilian pilots can contact the Special Use Airspace Information Service (SUAIS) (1-800-758-8723 or 907-372-6913) at Eielson Air Force Base to hear the latest update on military activity in the MOAs. The Yukon Training Area is covered by parts of three MOAs and Restricted Area R2205. Please review Figure 1.b for specific boundaries of these areas.



AA

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C. Street, Room 119
ANCHORAGE, ALASKA 99501-5126

ER 98/772

February 5, 1999

Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, Colorado 80523

Dear Ms. Herdrich:

In response to your request of October 15, 1998, we have reviewed the Alaska Army Lands Withdrawal Renewal Draft Legislative Environmental Impact Statement (EIS). We offer the following comments for your consideration in preparing the Final EIS.

General Comments

We believe the Draft EIS is inadequate as a basis for the Bureau of Land Management (BLM) to make recommendations concerning Congressional action regarding the granting of the proposed withdrawal. The Draft EIS does not meet certain requirements of the National Environmental Policy Act; for example, a section discussing specific mitigation measures is absent, as is a discussion of formal monitoring and enforcement activities.

The Final EIS should discuss hazardous or solid wastes, which are subjects of concern to the public and to BLM. In addition, discussions of Native American religious concerns, prime or unique farmlands, and wild and scenic river values should be added, even if they are addressed by negative declarations. We do not believe the Draft EIS adequately addresses cumulative impacts, particularly the unavoidable, eventual cost of cleaning up the land--or portions of the land--and either restoring it to the public domain or disposing of it. Also, there is no discussion of indirect impacts. We recommend that these issues be discussed in the Final EIS.

We believe Section 1.1 should be expanded to address the relationship between the preferred alternative and BLM policies, plans, and programs. This would give the reader a better understanding of how and why BLM is involved in management decisions on withdrawal areas.

We are concerned about the possible effects of a 50-year lease and we believe the Draft EIS should analyze more than two alternatives. Analyzing only a no-action alternative and a 50-year withdrawal fails to give decision makers enough information to assess potential effects of taking an intermediate course, such as authorizing the withdrawal for a shorter period, or establishing somewhat different boundaries to allow for greater public use. Adding alternatives for a shorter

RESPONSES TO COMMENT AA

POL-AA010: Please refer to Chapters 2.1.3.3 and 2.1.3.4 for a discussion of fuels and munitions use on the withdrawal lands.

CULT-AA002: Archeological sites on lands proposed for withdrawal have produced no human remains, funerary items, or other objects of cultural patrimony requiring consultation with Native Alaskans, per the Native American Graves and Repatriation Act of 1990 (NAGPRA). In addition, U.S. Army Alaska does not curate any artifacts subject to consultation per NAGPRA (Alaska State Historic Preservation Office, 1998). Coordination with Native Alaskans during preparation of the Integrated Cultural Resources Management Plan (Alaska State Historic Preservation Office, 1998) and during this project has identified no sacred sites or other resources of religious significance on lands proposed for withdrawal that would require consultation per the American Indian Religious Freedoms Act of 1978 or Executive Order 13007, Indian Sacred Sites. This coordination was through the Tanana Chiefs Conference, Inc. and the Native Alaskan groups listed in the distribution for completion of this LEIS (Chapter 8).

OTH-AA010: No prime or unique farmlands occur on the withdrawal lands.

WATER-AA005: Please refer to Chapters 3.8.4 and 4.8.4 *National Wild and Scenic Rivers System*. Changes have been made regarding your comments.

OTH-AA011: Please refer to the introductory paragraph to Chapter 4, *Environmental Consequences*.

OTH-AA012: See Chapter 1.5 which defines the reasons the Bureau of Land Management is a Cooperating Agency on this document. Also, see Chapter 1.10 and Table 1.b which provides a listing of the laws and regulations relating to the withdrawal renewals.

ALT-AA039: NEPA requires the preparer of an EIS to define and consider reasonable alternatives. Reasonable alternatives are those that are technically implementable. The Army and Air Force eliminated alternatives from further analysis if they could not be implemented without adversely affecting the military's mission in Alaska (see Chapter 2.3). In addition, NEPA requires a range of alternatives be analyzed in an EIS. Neither NEPA nor the CEQ Implementing Guidelines defines range by indicating a specific number of alternatives. Rather, the nature of the project, the scope of proposed actions, and the differing levels of impacts all contribute to the definition of range. For the LEIS to analyze the proposed action under a range of alternatives consisting of various lengths of renewal periods would offer little effective impact analysis since the scope of actions would remain virtually the same under each time period. Chapter 2.1 and 2.3 describe the methods used by the Army and Air Force in establishing the alternatives to be analyzed in this LEIS.

POL-AA010
CULT-AA002
OTH-AA010
WATER-AA005
OTH-AA011

OTH-AA012

ALT-AA039

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period or with different boundaries would substantially strengthen the document and address a major cause of public controversy over the action.

Our concerns about the length of the proposed withdrawal would be reduced if there were mechanisms identified and fully discussed to ensure adequate mitigation and monitoring. We are aware that The Barry M. Goldwater Range in southern Arizona has developed a cooperative management council consisting of the heads of several agencies to coordinate management among defense and natural resource management agencies. This council, which operates by consensus, will produce a report every 5 years that evaluates the need for the withdrawal and assesses how well the goals and objectives of the council are being met. If the Final EIS were to integrate a proposal for such a council into the preferred alternative and include as one of the council's roles adequate monitoring of the activities that occur during the lifetime of the withdrawal, we would support such a council and would be interested in actively participating. Such an action would reduce our concerns about the length of the proposed withdrawal.

Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) requires that any agency withdrawing public lands evaluate the effect of the withdrawal on subsistence uses and needs. If the agency determines that subsistence uses and needs may be significantly affected, the agency must hold public hearings and take several other steps prior to initiating the withdrawal. This determination is usually contained in an appendix because the requirements of ANILCA differ substantially from those of NEPA. We believe the determination in section 4.20 of the Draft EIS fails to meet all the ANILCA requirements, and that it should be expanded and moved to an appendix. Section 4.20 should be rewritten to meet NEPA's requirements. In addition, section 4.20 erroneously concludes that "As there is no subsistence activity as legally defined under ANILCA, the preferred alternative would result in no significant adverse effects on the customary or traditional subsistence uses of withdrawal lands on Fort Wainwright and Fort Greely." This statement is incorrect in that subsistence resources are hunted on both forts by qualified subsistence users as authorized by the Federal Subsistence Board. We suggest this be corrected in the Final EIS.

Attached are detailed comments on specific sections of the Draft EIS.

We appreciate the opportunity to comment on this Draft EIS, which represents a very significant action having wide-ranging effects on land management patterns in the Interior of Alaska. We would be pleased to assist the Army in making modifications for the Final EIS. Please contact Bob Schneider, BLM field office manager, at (907) 474-2302 to further discuss these comments and any way we may be of assistance.

Sincerely,



Paul B. Gates

Regional Environmental Officer - Alaska

ALT-AA040

ALT-AA040: Periodic review of the Army's use and management of the withdrawal lands would occur. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. These plans are written for a five year period with public, and Federal and State agency participation in the development and update process. The Army and Bureau of Land Management have entered into discussions relating to the cooperative management of Federal lands used by the Army. Also see proposed mitigation in Chapter 4.23 for monitoring programs which will be implemented on the lands if the withdrawals are renewed.

SUB-AA006

SUB-AA006: We have made changes to Chapter 3.20 and 4.20 based on your comments.

Attachment

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ATTACHMENT

Specific Comments

In the following comments ~~strikeout~~ is used to show suggested deletions and **shaded bold** is used for suggested additions.

Vol. I, pg. ES-1, Executive Summary

We suggest a complete citation is needed: This LEIS is required by the Military Lands Withdrawal Act (Public Law 99-606, **100 Stat. 3457, et seq.**)

OTH-AA013

OTH-AA013: Added in Final LEIS.

Vol. I, pg. ES-3, para. 1

We suggest this rewording: "...way or ~~other~~ authorization for...." [See Sec. 3(a)3(B) of P.L. 99-606 as source for this change.]

OTH-AA014

OTH-AA014: Change made to Executive Summary.

Vol. I, pg. ES-5, para. 2

We believe this section needs clarification - perhaps by adding at the end of the paragraph: "...the lands of this withdrawal renewal. **However, it does impact lands along the Richardson Highway located between the Ft Greely East and West Training Areas.**

OTH-AA015

OTH-AA015: Clarified in the Executive Summary the land on Fort Greely which will be surplusd after BRAC is completed. Also added reference to Figure ES.a

Vol. I, pg. ES-5, para. 5

We suggest deleting the first sentence: ~~All alternatives were considered.~~ Two alternatives were considered in detail....

ALT-AA041

ALT-AA041: Reworded Executive Summary.

Vol. I, pg. ES-6, para. 5

We suggest the second alternative of partial land withdrawal reference the land utilization maps: ...Alaska. Therefore, the Army and Air Force eliminated this alternative from further study. **Military utilization areas are shown on Figures 1.b, 2.b and 2.c.**

ALT-AA042

ALT-AA042: Added reference to Figure ES.a.

Vol. I, pg. ES-6, para. 7

The title of the fourth alternative is improperly labeled. The BLM does not "retain" the land; the Federal Government retains the land. The BLM manages Federal land. The alternative could be more properly worded:

ALT-AA043

ALT-AA043: Changed titles on 2.3.4 and Executive Summary to Bureau of Land Management Retain Authorization for Mineral Extraction.

"4. Land Opened to Mineral Leasing and Location." This alternative would allow the Bureau of Land Management the right to grant use of the withdrawal lands for mineral extraction without Army concurrence. **Surface use of the land would still require prior Army concurrence, limiting the opportunities for mineral extraction except by slant drilling, or similar extraction methods.**

This comment also applies to:

Alternative Considered page 2-36 paragraph 1 (2.3.4 Bureau of Land Management Retain Subsurface Mineral Rights).

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Vol. I, pg. ES-6, Alternatives Eliminated from Further Study

The scope of actions would NOT remain virtually the same during varying time periods. Changes in policy within the government at all levels and departments are continuous. Environmental management of lands under the care of the Army is subject to change with each new individual assigned to a responsible position affecting the implementation of resource management plans. Selection of shorter time periods would provide greater flexibility to the people of the United States to influence the management of the withdrawn lands. We believe additional alternatives should be addressed in the Final EIS.

Vol. I, pg. ES-6

We believe the Final EIS needs more explanation as to why 15- or 20-year renewals were not considered in detail. The "Preferred Alternative of Withdrawal Renewal" for 50 years is over three generations. Granted, Congress has the decision authority; however, we believe Congress should be provided facts and information as to why alternatives with 15- or 20-year time periods would not meet the military objectives.

Vol. I, pg. ES-6, para. 4

The last sentence of the first alternative to renew the withdrawal for varying lengths of renewal periods, is not the BLM preferred alternative, this should be corrected. We believe that sufficient studies have not been completed to evaluate the environmental impacts from the last 50 years of military use and that the evaluation is not sufficient to warrant more than the Federal Land Policy and Management Act mandate of 20 years maximum. A 15- to 20-year withdrawal, which has a monitoring plan - especially on the existing high impact areas - is preferred. Evaluation of the decontamination efforts implemented to date has not been completed - or at least is not evident in the Draft EIS. Alternate high impact areas may need to be evaluated to allow existing areas to be reclaimed. The proposal as written doubles the amount of land closed to the public in the Ft. Greely west area with almost no justification. These same comments apply to Sections 2.1.3 Preferred Alternative, page 2-5 and 2.3.1 Alternatives Considered, page 2-32.

Vol. I, pg. ES-7, Section 5, Acquiring Alternate Training Lands.

We believe that the military plans for the eventual clean-up and decontamination of impact areas should be explained. It may be desirable to limit the areas of actual impact of explosive ordinance so that clean-up and decontamination may be less cost prohibitive. It appears that many of the target areas (Figs. 2.d & 2.e) are located in or very near wetlands. These are the areas that are the most difficult to clean up, besides having the potential for water quality contamination.

Vol. I, pg. ES-7, para. 4 to end of page

The following are suggested to clarify the presentation:

1. The No Action Alternative would occur if Congress does not grant the requested withdrawal renewal. The lands would no longer be available for military use after November 5, 2001. These lands in conjunction with the recently approved Military

ALT-AA044

ALT-AA044: Periodic review of the Army's use and management of the withdrawal lands would occur. In accordance with the Sikes Act, U.S. Army Alaska is preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely. These plans are written for a five year period with public, and Federal and State agency participation in the development process. Also see proposed mitigation in Chapter 4.23 for monitoring programs which will be implemented on the lands if the withdrawals are renewed.

ALT-AA045

ALT-AA045: The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ALT-AA046

ALT-AA046: U.S. Army Alaska is the preparer of this LEIS. Its Preferred Alternative is to renew the withdrawals for 50 years. The Bureau of Land Management's preferred term for withdrawal renewal will be included in its recommendation to Congress.

Sufficient studies have not been completed to fully evaluate the environmental impacts from military use. Proposed mitigation in this LEIS will collect the necessary data to assess impacts and determine the rehabilitation and restoration to be implemented through the Integrated Natural Resources Management Plans under the Army's ITAM (Integrated Training Area Management) program.

MIT-AA011

MIT-AA011: Please refer to responses for POL-A001 and POL-A002. Proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical resources (see Chapter 4.23).

ALT-AA047

Impact Areas are permanently dedicated areas where shelling, bombing, explosive demolition, and direct fire from weaponry occurs. Areas that receive impact from ammunition are limited to the locations in the vicinity of Army and Air Force Target Arrays. Thus, current decontamination efforts are concentrated in these areas.

ALT-AA047: No Change Necessary.