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Operations Areas provide a unique training opportunity. The loss of these training lands would severely reduce combat readiness for military units worldwide.

If the military land withdrawals are not renewed, jurisdiction of the land would revert to the BLM. **If the lands are contaminated to an extent which prevents opening the lands to the operation of the public land laws, the military would be responsible for clean up and public safety under Section 8(e) of the PL 99-606.** The State of Alaska has already selected these lands in accordance with the Alaska National Interest Lands Conservation Act (ANILCA, 94 Stat. 2371) for recreation, mineral rights, wildlife, forestry, agriculture, settlement and transportation values. **Until the land is conveyed to the State, the land would be managed by BLM under the existing Resource Management Plans until new plans could be developed.**

Conveyance to the State could preclude reestablishment of the training areas in the future. No other large Federal land masses with road access to military land exist in Alaska except parks, forests, and wildlife refuges.

Vol. I, pg. ES-8, para. 1

The Final EIS should be corrected to show that the BLM's preferred alternative is to renew for a maximum of 20 years, until November 6, 2021.

ALT-AA048

ALT-AA048: 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.

Vol. I, pg. ES-8 para. 2

We suggest the following corrections:

During the withdrawal period, the Secretary of the Interior **and the Secretary of the Army** would manage the lands subject to conditions and restrictions necessary to permit military use of these lands. The Secretary of the Army would close any road, trail, or portion of the land to public use if necessary for public safety, military operations, or national security. The Secretary of the Interior can issue a lease, easement, right-of-way, or **other** authorization for nonmilitary use of these lands with the concurrence of the Secretary of the Army. Hunting, fishing and trapping on these lands is permitted in accordance with the provisions of *Military Reservations and Facilities: Hunting, Fishing and Trapping* (Title 10 United States Code Section 2671).

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.

Vol. I, pg. ES-11, Executive Summary, Issues

The issue of Submerged Lands is not clearly defined. We suggest re-wording this issue. Perhaps more than one issue exists relating to water quality and submerged lands and they could be separated for clarity.

LAND-AA004

LAND-AA004: 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 describe submerged lands and their relation to land use. Chapter 4.8.2 describes the issue of water quality of withdrawal lands.

Vol. I, pg. ES-85, Section 3.17.6, Aerial Tours and Guide Service

It should also be noted in the Final EIS that any commercially guided or outfitted hunts would need to be permitted by the BLM under Special Recreation Use Permit guidelines and with concurrence of the military.

ACC-AA016

ACC-AA016: Information has been added to Chapter 3.17.6.

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Vol. I, pg. I, Table of Contents

We suggest this correction: Purpose of and Need for **Proposed** Action

Vol. I, pg. ii, Table of Contents

Affected Environment 3.8 Surface Water. We suggest that **Floodplains**, which are required by NEPA to be addressed, may be a more appropriate title for Section 3.8.1 than Streamflow.

Vol. I, pg v, Table of Contents

A section is missing after 4.22. A new section 5 needs to be added:

Monitoring Plan

5.1 Existing and proposed mitigation measures

5.2 Studies to be completed prior to future withdrawal renewal

Vol. I, pg. 1-2, para. 1, Military Lands Withdrawal Act

We suggest this modification: "...a lease, easement, right-of-way, or **other** authorization for...." [See Sec. 3(a)(3)(B) of P.L. 99-606 as source for this change.]

Vol. I, pg. 1-2, Section 1.1.2, Description of Fort Greely West and East Training Areas

We believe a new paragraph is needed to explain separation of two training units and reference the map: "The two training areas are separated at the north by the main post withdrawal, Public Land Order 255, and at the south by a transportation corridor withdrawal, Public Land Order 5150, utilized by the trans-Alaska oil pipeline and the Richardson Highway (The parcel locations are shown on figure ES.a.)."

Vol. I, pg. 1-4, Section 1.2, Need For Action, para. 3

We suggest adding a new heading to clarify which land area is being discussed:

Fl. Greely Training Areas, Army Use

Fort Greely is suitable for testing....

Vol. I, pg. 1-5, Section 1.2, Need For Action, para. 2

we suggest adding a new heading to clarify land area being discussed:

Fl. Wainwright Yukon Training Area, Army Use

Fort Wainwright Yukon Training Area is the closest....

Vol. I, pg. 1-5, para. 3

We suggest adding a new heading to clarify additional land use:

U.S. Air Force Use

The U.S. Air Force is a major user of....

Vol. I, pg. 1-5, para. 5

As written, we believe this section does not present a convincing need for the proposed action.

We suggest adding a new heading and inserting text from chapter 2:

1.2.1 Military Operations Parameters & Training Needs

OTH-AA016

OTH-AA016: The title of Chapter 1 in the LEIS, *Purpose of and Need for Action*, is the recommended title of this chapter by the CEQ Implementing Guidelines for NEPA.

WATER-AA006

WATER-AA006: Information regarding floodplains is contained in Chapter 3.8.1.2 High Flow/Floodplains, Figure 3.8.c Floodplains, and in Appendix 3.8.B Floodplains.

MIT-AA012

MIT-AA012: Chapter 4.23 *Existing and Proposed Mitigation* has been added to the Final LEIS. This chapter describes existing and proposed mitigation measures for each resource evaluated in the LEIS. Mitigation measures are also described for each resource within Chapter 4 *Environmental Consequences*. Mitigation measures are also outlined in Chapter 2.1.3.6 *Existing Mitigation* and Chapter 2.1.3.7 *Proposed Mitigation*.

OTH-AA017

OTH-AA017: Added word "other" on Page 1-2.

OTH-AA018

OTH-AA018: No Change Needed. Figure 1.a is referenced.

OTH-AA019

OTH-AA019: Change not necessary.

OTH-AA020

OTH-AA020: Change not necessary.

OTH-AA021

OTH-AA021: Change not necessary.

OTH-AA022

OTH-AA022: Change not necessary.

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Realistic training situations must exist to ensure the combat readiness of our armed forces in all environments.... This in turn, threatens our military's national defense capabilities and our ability to protect U.S. forces and interests worldwide.

[insert section 2.1.1 from pgs. 2-1, 2-2, 2-3, and 2-4]

Training Needs

There are three general military land uses: 1) Cantonment or Main Post areas; 2) Impact Areas; and 3) Training Areas. The withdrawal renewal lands are utilized only for Impact Area and Training Area land uses.

Impact Areas

Impact Areas are permanently designated areas where.... A division-sized area of operations may range between 2-5 million acres (DA 1991).

Vol. I, pg. 1-6, Section 1.3, Proposed Action

We believe this discussion should reference a map describing the general location on the subject lands possibly with a new second paragraph as follows: **The general location of the lands involved, in relationship with other military land withdrawals is shown in Figure 1.a**

OTH-AA023 OTH-AA023: Added reference to Figure 1.a.

Vol. I, pg. 1-9, Section 1.8, Issues, para. 2

Under Access, we suggest changing the wording of the last sentence: Access: Conflicts of public use of the withdrawal lands and overlaying airspace for recreational activities. This issue will be further addressed in the Integrated Natural Resource Management Plans that are being prepared. Not be resolved in this LEIS.

ACC-AA017 ACC-AA017: Change not necessary.

Vol. I, pg. 1-9, Section 1.8, Submerged Lands

We recommend changing the wording of the last sentence: Submerged Lands: Impacts on water quality and contamination of submerged lands (property below the mean high level water mark) due to military use will be monitored in the future, and Jurisdiction of submerged lands on the withdrawal properties, particularly the Delta River may have to be resolved in court, where other lands withdrawn at the time of statehood are presently in litigation.

LAND-AA005 LAND-AA005: 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 describe submerged lands and their relation to land use. Chapter 4.8.2 describes the issue of water quality of withdrawal lands.

This comment also applies to:

Section 3.1.1 Submerged lands page 3-2, last paragraph.

Vol. I, pg. 1-11, Regulatory Requirements

We suggest additional citation information be included:

The Engle Act of 1958 (43 U.S. Code 155 et seq.)

The Military Land Withdrawal Act of 1986 (MLWA, PL 99-606, 100 Stat. 3457)

The Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.)

OTH-AA024 OTH-AA024: Included in Final LEIS.

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Vol. I, pg. 1-15, Section 1.10.3

We suggest explaining the relationship of this action to BLM policies, plans, and programs and summarizing land use determinations which affect the proposed action or alternatives by adding something similar to the following: This EIS does not pre-empt or replace the existing resource management plans listed below. The following Resource Management Plans, prepared jointly with the Army in 1994, will continue to be implemented through MOU AK-930-9508 until November 6, 2001, or until the MOU is cancelled, extended, or renewed. Approval of the proposed Integrated Natural Resource Management Plan for these lands may require modification or replacement of the MOU. The plans are:

Fort Greedy Resource Management Plan (BLM/AK/PT/94/010+1600+080)

Fort Wainwright Yukon Maneuver Area Resource Management Plan (BLM/AK/PT/94/011+1600+030)

Vol. I, pg. 2-3, Military Operational Parameters, para. 3

The last sentence states "These zones deny access..." More accurate wording might be: "These zones deny Access to land areas in safety zones when weapons are being used is denied."

OTH-AA026

OTH-AA026: Change not necessary.

Vol. I, pg. 2-5, Section 2.1.2, No Action Alternative

The first paragraph needs additional wording to clarify the land status:

of Alaska subject to valid existing right and Native selection rights. However, lands listed as moderate to low priorities for conveyance to the State may be retained under BLM management.

ALT-AA049

ALT-AA049: Removed "Native Selection Rights" under the No Action Alternative. Also included discussion of status of lands if not conveyed to the State under the No Action Alternative in Chapter 2.1.2.

Decontaminated land not conveyed to the State will remain withdrawn from all forms of appropriation, including location and entry under the mining laws and from leasing under the Mineral Leasing Act until further classified by BLM. Until the land is conveyed to the State (if ever), the land would be managed by BLM under the existing Resource Management Plans until new plans could be developed.

Conveyance to the State could preclude reestablishment of the training areas in the future. No other large Federal land masses with road access to military land exist in Alaska except a park, a forest, and a wildlife refuge.

Vol. I, pg. 2-6, para. 1, end of line 3

We suggest adding a word: "... these lands. Management of these lands would follow the Integrated Natural Resource Management Plans..."

ALT-AA050

ALT-AA050: Included in Final LEIS.

Vol. I, pg. 2-8, Section 2.1.3, Preferred Alternative

We suggest this paragraph reference Figure 2 d.

ALT-AA051

ALT-AA051: Change not necessary.

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Vol. I, pg. 2-9, Section 2.1.3, Preferred Alternative, para. 2

We suggest acreage necessary to support the operations be quantified: The Training Areas were established to support battalion-sized operations **(47,000 to 61,000 acres)** under varying terrain conditions. The Training Areas west of the Delta River can support brigade or task force-sized maneuvers or operations **(94,000 to 190,000 acres)**.

Vol. I, pg. 2-18, Section 2.1.3, Preferred Alternative, para. 1

We suggest ending the paragraph with a reference to **Figures 2.c, 2.d and 2.e.**

Vol. I, pg. 2-20,

We believe that the discussion under the subheading "Fuels" deals with solid and hazardous waste and that this information is important enough it should have its own heading in the Affected Environment Section - Chapter 3.

Vol. I, pg. 2-26, Section 2.1.3.1, Existing Mitigation and**Pg. 2-28, Section 2.1.3.2, Proposed Mitigation**

Since Cultural Resources are addressed in this EIS, we believe they should be included in the list of implemented programs to be continued in the future.

Vol. I, pg. 2-30, Section 2.2, Comparison of Alternatives, para. 3

An assumption appears to have been made that all the lands presently under withdrawal would be conveyed to the State. This is not a very likely scenario. However, if that assumption is used for purposes of Table 2.k, the wording in paragraph 5 should be modified and a BLM management scenario added: **Table 2.k assumes under the No Action alternative that all land in the withdrawal would be conveyed to the State. Any lands not conveyed to the State would be managed by BLM. The BLM management may involve issuing leases or authorizing other uses, but not conveyance into private ownership. Management of the land would be the same as in the proposed action except Army concurrence would not be required.**

State resource management under the No Action....

This comment also applies to Table 2.1

Vol. I, pg. 2-31, Table 2.K

This entire chart is based on a comparison of the management policies of the Army and the State of Alaska. This is supposition of events in the future. Upon expiration of the withdrawal, the land ownership will remain unchanged unless and until it is made suitable for return to the public domain. The BLM will still be the Federal land manager. The chart should be modified in the Final EIS to reflect this fact, since future disposition of these lands is not the issue of this EIS nor is the hypothetical management policies of a possible future land holder.

ALT-AA052

ALT-AA052: Change not necessary.

ALT-AA053

ALT-AA053: Change not necessary. Reference to figures are in the previous paragraph.

POL-AA011

POL-AA011: 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.

MIT-AA013

MIT-AA013: Added existing mitigation to Chapter 4.18 and Chapter 2 under the Preferred Alternative.

ALT-AA054

ALT-AA054: See Chapter 2.1.2 the No Action Alternative description.

ALT-AA055

ALT-AA055: To analyze impacts under the No Action Alternative, management policies and plans of the future land holder for the withdrawal lands were reviewed. The No Action Alternative (Chapter 2.1.2) defines what will happen to the withdrawal lands if the withdrawals for military use expire.

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Vol. I, Chapter 3, Affected Environment

We suggest improving maps, such as Figures 3.11.a Ecosites (pp 3-140) through 3.11.e (pp 3-44) by adding geographic reference such as creeks, roads, or village names, to make them more useful.

VEG-AA001

VEG-AA001: Waterways have been added to Figures 3.11.a-3.11.e.

Vol. I, pg. 3-1, para. 4 and 5, Land Acquisition

It was difficult to verify the information in this section without a reference number for the Public Land Orders and Legislation. We suggest adding those identified below. Also, there are a few discrepancies with dates and wording, for example, BLM does not segregate land-withdrawal orders do:

LAND-AA006

LAND-AA006: Appendix 1.B contains detailed information on land acquisition of Fort Wainwright and Fort Greely. Figures 3.1.a and 3.1.b include all Public Land Orders and Public Laws by their numbers. Appendix 1.B is referenced in Chapter 3.1. Segregation wording in Chapter 3.1 was corrected.

In 1950 the Air Force obtained a non-expiring withdrawal of 22,600 acres through a Public Land Order (PLO) 684 within what is now known as the Fort Wainwright Yukon Training Area. Additional withdrawals were granted to the Air Force in 1952 (PLO 794) for 6,720 acres and in 1955 (PLO 1205) for 4,760 acres. These withdrawals were later transferred to the Army by PLO 1523. In 1956 the Army obtained permit from the Secretary of Interior for use of 256,000 acres (see BLM Casefile F-020174) and two NIKE missile test sites (see PLO 1523), making up the remainder of the Yukon Training Area.

After passage of the Engle Act in 1958...Congress passed legislation Public Law 87-326 withdrawing 256,000 acres of the Fort Wainwright.... That withdrawal was extended for an additional five years in 1971 1972 through a Public Land Order 5240. In 1976, the Bureau of Land Management The withdrawal application notice published in 1975 (BLM Casefile F-020174) segregated the Yukon Training Area from public use ... with the passage of the Military Lands Withdrawal Act by Congress Public Law 99-606, 100 Stat. 3457. At that time, the Army did not....

Fort Greely West and East Training Areas:

In 1950, the Army obtained a Special Land Use permit from the DOI. For use of The 572,000 acres now known as the Fort Greely West Training Area was segregated from public use by publication of withdrawal notice F-35871 in 1955. The permit was granted six month extensions until passage of legislation Public Law 87-326 in 1961 granting withdrawal for a ten year term. The withdrawal was renewed in 1971 1972 for five years by PLO 5238, excluding a five acre Trade and Manufacturing site near the western edge of the West Training Area. In 1976 the Bureau of Land Management The land remained segregated the West Training Area from public use pending renewal of...

Vol. I, pg. 3-1, Section 3.1, Land Use

We suggest adding some clarifying language: U.S. Army Alaska is currently preparing Integrated Natural Resources Management Plans for Fort Wainwright and Fort Greely, as required in the Sikes Act (16 USC 670a et seq.). It is working closely with the BLM. When

LAND-AA007

LAND-AA007: Added Sikes Act to Chapter 3.1.

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the Integrated Natural Resources Management Plans are completed and approved, joint management of the withdrawal lands will continue under the new plans.

If the withdrawal is not renewed, the land will continue to be managed under existing plans (without the need for military approval) until the lands are conveyed or a new plan is in place.

Vol. I, pg. 3-2, Section 3.1.1, Land Acquisition for Military Use/Submerged Lands

We believe the nature of the desired cleanup needs to be described or defined in the section that state: "...the Alaska Division of Land has requested cleanup of the Delta River."

LAND-AA008

LAND-AA008: 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).

Vol. I, pg. 3-3, Section 3.1.2, Existing Rights-of-Way

We believe these paragraphs should refer to the entity **granted** the rights-of-way, not who *manages* them, as this can change daily. The discussion should include the BLM serial numbers (TAPS F-12505, ANGTS F-24538, TAGS F-83941) and the Alaska Natural Gas Transportation System was granted to the Alaska Natural Gas Transportation **Company**.

LAND-AA009

LAND-AA009: Removed management companies from discussion on Rights-of-Way on the Withdrawal Lands.

Vol. I, pg. 3-3, Section 3.1.3, Surrounding Land Use

The final sentence of the last paragraph, the BLM record for T.1S .R.4E., Fairbanks Meridian, does not show conveyance of land to Native corporation by Interim Conveyance 783.

LAND-AA010

LAND-AA010: Change not necessary.

Vol. I, pg. 3-3 and 4, Section 3.1.3, Surrounding Land Use

We suggest paragraphs 4 and 5 need quantification of use for agriculture and settlement, and should be modified: State lands to the south are managed for fish and wildlife habitat and forestry. **About 3,000 acres have been designated for agricultural sale and 200 acres for settlement.**

LAND-AA011

LAND-AA011: Added acreage amounts into discussion on surrounding land use in Chapter 3.1.

The Chena River Recreation Area... is managed for agriculture, public recreation **and** fish and wildlife habitat. **Approximately 490 acres is designated for future recreational settlements or fee simple homesteads.**

State lands to the north of Fort Greely are managed for forestry, fish and wildlife habitat, public recreation & watershed maintenance. **Up to 60,000 acres may be designated for agricultural disposal depending on results of soil surveys. An additional 1,000 acres is designated for future settlement.**

Vol. I, pg. 3-10 to 3-11, Terrain/Glaciers

The Draft EIS suggests that "no glaciers exist in the Fort Wainwright Yukon Training Area or the Fort Greely West and East Training Areas," and that "valley glaciers located in this rugged topography included Gilliam, Trident (whose terminus is within Fort Greely West Training)." Section 3.3 should state "that glaciers do exist in the Fort Greely West Training Area (see Map -Figure 3.3.c)."

GLAC-AA001

GLAC-AA001: No change necessary. Please refer to Chapter 3.3 *Terrain* and Chapter 3.3.1 *Glaciers*.

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Vol. I, pg. 3-11, Section 3.4, Geology

It is inaccurate to say the region contains deformed and faulted metamorphic and igneous rocks of Precambrian to Mesozoic age. It is important to differentiate the ages of metamorphic versus igneous rocks. A more accurate statement might begin, "This is a region of deformed and faulted metasedimentary and metaigneous rocks of Paleozoic and possibly Precambrian age that are intruded by plutons of Mesozoic and Cenozoic age, and overlain...."

GEOL-AA001

Vol. I, pg. 3-12, Section 3.4, Geology

The later and more complete version of Foster et al., 1987, should be referenced here:

Foster, H.L., Keith, T.E. C., and Menzie, W.D., 1994, Geology of the Yukon-Tanana area of east-central Alaska, in The Geology of Alaska, George Plafker and H. C. Berg (eds): Geological Society of America, Boulder, Colorado, The Geology of North America, G-1, pp. 1977-217.

GEOL-AA002

A published abstract, Page et al., 1995 (see below), should be referenced here with, or instead of, "Hammond, personal communication."

Page, R.A., Plafker, George, and Pulpan, Hans, 1995, Earthquakes and block rotation in east-central Alaska: GSA Abstracts and programs, v. 27, no. 5, p.70.

The paragraph which begins "There has not been...." omits geologic mapping that has been done in the two areas, which includes Weber, et al., 1978, for the Fort Wainwright military holdings, and Nokleberg et al., 1992 (see below), for the Fort Greely holdings, which we suggest be included:

Nokleberg, W. J., Aleinikoff, J.N., Lange, I.M., Silva, S.R., Miyaoka, R.T., Schwab, C.E., and Zehner, R.E. 1992, Preliminary geologic map of the Mount Hayes quadrangle, eastern Alaska Range, Alaska: U.S. Geological Survey Open-File Report 92-594, 1 sheet, scale 1: 250,000, 39 p.

Vol. I, pg. 3-12, Section 3.4, Geology, Fort Wainwright Yukon Training Area

References are needed to substantiate the Proterozoic age, which is not an accepted age.

GEOL-AA003

Vol. I, pg. 3-13, Section 3.4, Fort Greely West and East Training Area

The third sentence of the first paragraph should read: "The Fort Greely area is underlain by altered metasedimentary and metavolcanic sedimentary and volcanic rocks...."

GEOL-AA004

Vol. I, pg. 3-14, Section 3.5, Mineral Resources

It is derived from the summary in Section 3.5 of the Draft EIS that mineral exploration surveys are not complete enough to identify or evaluate the potential mineral deposits that may exist in the area of concern. We suggest that mineral resources be evaluated in more detail to better ascertain potential mineral deposits.

MIN-AA012

GEOL-AA001: Some geologic terms in the Preliminary Draft LEIS were considered too technical for the general audience, so the language was deliberately simplified. From a geologist's point of view, the result may be perceived as oversimplification or inaccuracy. However, the LEIS must consider non-geologists as well as trained geoscientists. As a compromise, only the most essential geologic terms were used in the Draft LEIS, and a simple glossary and geologic time scale were included in Appendix 3.4.A.

Chapter 3.4 *Geology* has been modified to include the age of the rocks.

GEOL-AA002: Although Foster et al., 1987 was not cited on this particular page of the Draft LEIS, the 1994 publication is an important work that will be referenced elsewhere and added to the Bibliography.

The abstract by Page et al. has been reviewed, cited as suggested, and added to the Bibliography. Note that B. Hammond was inadvertently omitted from Chapter 7 Agencies and Individuals Contacted. The correct entry reads as follows: "Hammond, Bob. Geophysicist, Alaska Volcano Observatory. Fairbanks, Alaska."

References were not used for this general introductory statement. However, work by Weber and Nokleberg is extremely important and is cited elsewhere in the Draft LEIS.

GEOL-AA003: The Proterozoic age was derived from Foster et al. (1994), pp. 207 and 235. However, the paragraph has been modified to be more consistent with the earlier description of the Yukon-Tanana terrane. Please refer to Chapter 3.4 *Geology*.

GEOL-AA004: As noted in comment GEO-AA001, some terms have been deliberately simplified to accommodate readers who do not have a background in geology.

MIN-AA012: No change. The Army does not intend to conduct surveys to ascertain potential mineral deposits.

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Vol. I, pg. 3-14, para. 2, last line
 "Kiell" should be "Keill."

Vol. I, pg. 3-14, Section 3.5, Saleable Minerals
 The name should be corrected to "Bundtzen."

Vol. I, pg. 3-15, Fort Wainwright Yukon Training Area, Locatable Minerals
 The reference Menzie and Foster, 1979, should be included at the end of the fourth sentence of the third paragraph after "target for sedex-type mineralization."

It is inaccurate to attribute the described zinc and lead mineralization to rocks distant (i.e., in the eastern Alaska Range and southeastern Yukon Territory) from the Wainwright training area, whereas drilling shows them to be quite close to Wainwright and in the same unit, Pzq. The inaccuracy may affect the evaluation of locatable mineral potential.

Vol. I, pg. 3-16, Section 3.5, Mineral Resources, Fort Wainwright Yukon Training Area, Locatable Minerals

The sentence on the top line should read: "...contains ~~metavolcanic and metasedimentary~~ volcanic and sedimentary rocks..."

Vol. I, pg. 3-26, para. 1 and 2
 It is not necessarily true that river channels, lakes, wetlands, and other low-lying areas covered by water are permafrost free. It is quite common to find permafrost under many of these areas around Fairbanks. We suggest this be corrected in the Final EIS.

Vol. I, pg. 3-26, para. 1
 The last sentence of the first paragraph is incorrect. While thaw bulbs exist around sizeable rivers and they can be basically permafrost free, wetlands frequently exist because of poor drainage caused by underlying permafrost. We suggest this be corrected in the Final EIS.

Vol. I, pg. 3-26, Section 3.8, Surface Water Fort Greely West and East Training Areas
 We suggest including a reference and map that indicates the area's location.

Vol. I, pgs. 3-30 and 3-31, Water Quality
 It should be noted that criteria within Alaska Water Quality Standards Section 1(C) "Growth and propagation of fish, shellfish, other aquatic life and wildlife" can be more stringent than section 1(A). In particular, this can occur with dissolved metals. We suggest deleting the reference to section 1(A) in the first sentence of the second paragraph of page 3-30.

There is little mention of the water quality of the Delta River which is in the interior reaches of the Fort Greely East and West Training Area. This river was mentioned in Section 3.2, as possibly needing cleanup. We believe that, in the Final EIS, more detail on water-quality characteristics is required for all interior rivers and streams to determine appropriate baseline conditions and possible future changes in water-quality.

MIN AA013: Changes have been made to Chapters 3.5 and 7 regarding your suggestions.

MIN-AA014: Changes have been made to Chapters 3.5 regarding your suggestions.

MIN-AA013

MIN-AA015: The reference will be added as indicated; however, the date of this reference is actually 1978, not 1979. Corrections were made to Chapter 3.5 and Chapter 6.

MIN-AA014

Chapter 3.5 *Locatable Minerals* has been rewritten to accurately describe the drilling close to Fort Wainwright.

MIN-AA015

MIN-AA016: As noted in response to GEO-AA001, some terms have been deliberately simplified to accommodate readers who do not have a background in geology.

WATER-AA007: Changes have been made to Chapter 3.7 regarding your suggestions.

MIN-AA016

WET-AA001: Changes have been made to Chapter 3.7 regarding your suggestions.

WATER-AA007

WATER-AA008: No change. Please refer to Figure 3.8.b for surface water bodies on Fort Greely. Figure 3.8.b has been referenced in Chapter 3.8. Please refer to Figure 1.a for a general location map of the withdrawal area.

WATER-AA009: Please see Chapter 3.8.2 *Water Quality* for changes relating to Alaska Water Quality Standards.

WET-AA001

Recent surface water quality surveys have not been completed for the withdrawal lands by the military or any State or Federal entity. A limited site-specific water quality investigation of Fort Greely training lands was 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 during sampling and the data indicated the stream chemistries were not adversely affected by munitions. Please refer to Chapter 4.8.2 and Appendix 3.8.D for further information.

WATER-AA008

WATER-AA009

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. All analyzed munitions values were below detectable limits. Please refer to Appendix 3.8.D for study results. No other water samples collected within the withdrawal areas were analyzed for munitions.

Water quality data record of collection proved to be too sporadic to provide a comprehensive assessment of the water quality of the withdrawal areas. Also, current water quality could not be derived from these records. A table in Appendix 3.8.D shows available water quality data for streams within the withdrawal areas.

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).

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Vol. I, pg 3-40, Section 3.9.2, Groundwater Quality

The Draft EIS contains the statement that “the source of nitrate is not known.” We recommend that further study be conducted to determine if this contaminant is affecting ground-water resources.

Vol. I, pgs. 3-40 and 3-41, Groundwater Quality

We suggest this section address how groundwater quality differs from surface water and why there are differences. It should also address the difference in sample results from background samples and (impact area?) other samples, as well as identify sample locations.

Vol. I, pg. 4-39, para. 5, and top of pg. 4-40

We suggest the Final EIS discuss potential impacts of revegetation and invasion of introduced species and how these will be mitigated. Rehabilitation of disturbed areas should be done using native species appropriate to the site. Using grasses as a quick fix for restoring vegetation is more often than not an impediment to the restoration of the approximate natural succession at any given site. We suggest this section include a brief statement that helps the reader establish appropriateness of rehabilitation. The invasion of introduced plant species on disturbed sites, either through incidental seed transfer (vehicle track) or rehabilitation (seed mix), should be guarded against during maneuvers and rehabilitation and maintenance.

Vol. I, pg. 3-53, Section 3.11.2, Timber Management

We believe the responsibility of the BLM on the military withdrawals need to be more adequately described. Although the first paragraph mentions joint managers, there is no recognition that the Secretary of the Interior is given the responsibility to manage (through BLM) nonmilitary use of the withdrawn lands and their resources. Sec. 3 of Public Law 99-606 states in part “During the period of the withdrawal, the Secretary of the Interior shall manage the lands withdrawn under section 1 pursuant to the Federal Land Policy and Management Act of 1976 and other applicable law...and this Act.” Sec. 3(B) states that “The Secretary of the Interior may issue any lease, easement, right-of-way, or other authorization with respect to the nonmilitary use of such land only with the concurrence of the Secretary of the military department concerned.”

Vol. I, Figure 3.12.c-g

It is unclear whether changes in wildlife use areas or sensitive habitat boundaries between cooperative agreements, EISs, or reviews negates the past areas and boundaries or adds to them. We suggest this be clarified in the legend or the associated text. Also, some of these figures need additional geographic features labeled. For example, 3.12.d, f, g, and h have no labels.

Vol. I, pg. 4-56, Section 4.14, para. 3

We suggest that the Final EIS be modified to reflect that range extensions of some common or invading species need not be protected, but that rare species or those requiring further study should be protected.

WATER-AA010

WATER-AA010: Please refer to Chapter 3.9.2 for amended text.

WATER-AA011

Mitigation has been proposed to review existing groundwater quality and quantity data to determine the scope of a future groundwater monitoring network. Nitrate would be included within the sampling protocol. Please refer to Chapter 4.9.2 and Chapter 4.23.

VEG-AA002

WATER-AA011: An effective comparison between surface water and groundwater quality cannot be made with the limited data available. This is due to the lack of lengthy, historical surface and groundwater quality records for both Fort Wainwright and Fort Greely. Additionally, surface and groundwater sample locations are not necessarily in the same areas to allow for analyses.

No groundwater monitoring wells have been drilled on the Fort Wainwright Yukon Training Area or the Fort Greely East and West Training Areas. Thus, no groundwater quality data are available for the Impact Areas. An analysis of background water quality samples as related to “other samples” is not possible due to lack of data for the withdrawal areas.

FOR-AA002

Please refer to Figures 3.9.a and 3.9.b for the locations of groundwater quality sampling stations listed in Chapter 3.9.2 and Appendix 3.9.A.

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.

VEG-AA002: Specific vegetation rehabilitation projects and identification of invasive species will be completed through the Land Condition-Trend Analysis and Land Rehabilitation and Maintenance programs. Please review Appendix 2.D for a description of these programs.

WILD-AA004

FOR-AA002: The information has been added.

WILD-AA004: Names of waterways have been added to the maps. The LEIS is not intended to be a management plan. The areas identified are the most recent information available. The Army and Alaska Department of Fish and Game have a cooperative agreement for management of sensitive species and habitats. The Integrated Natural Resources Management Plans replace the cooperative agreement and contain the new information.

TES-AA001

TES-AA001: The Army protects Federal or State listed threatened or endangered plant species.

AA

Vol. I, pg. 4-56, Section 4.14, para. 1

As stated in the Draft EIS, trumpeter swans are most vulnerable to aircraft noise during nesting and staging periods. We suggest restricted activity dates on Ft. Greely for trumpeter swan nesting and brooding areas should be described in the text in chapter 3, including a list of these dates (Section 3.14), and a discussion of why no restriction is thought to be necessary and/or future implementation of restricted activity dates (proposed mitigation, Section 4.14.).

WILD-AA005

WILD-AA005: The U.S. Fish and Wildlife Service has not designated restricted activity dates for trumpeter swan management on Fort Greely.

Vol. I, pg. 4-59, Section 4.15, para. 2

Smoke impacts (air quality) is, we believe, a concern from incendiary-caused vegetation fires. Both withdrawals, the Ft. Wainwright Yukon Training and the Ft. Greely West and East Training Areas, are adjacent to communities and outlying residential areas. We suggest the Final EIS discuss the impacts to health, aviation visibility, and highway closures due to smoke.

FIRE-AA005

FIRE-AA005: Please refer to Chapter 4.15 *Fire Management* under the Preferred Alternative.

Vol. I, pg. 3-67, para. 3

This is the first of several places where it is stated, in contradiction to other portions of the document, that Breeding Bird Surveys (BBS) have been done on both withdrawals. It is clearly stated in section 3.12.4, paragraph 1, that no BBS have been conducted on Ft. Greely. We suggest this be rectified. Also it is likely that ospreys do occur on Ft. Greely. We suggest that documentation of this species on Ft. Greely be described.

WILD-AA006

WILD-AA006: The paragraph does not contain information on Breeding Bird Surveys. Corrections have been made to other sections of the document. Table 3.14.b lists that osprey have been sighted on Fort Wainwright and Fort Greely. No nests have been confirmed. See Chapter 4.14 under the Preferred Alternative for a discussion of osprey.

Vol. I, pg. 3-67, para. 4

Migratory birds are offered protection under the Migratory Bird Treaty Act (16 U.S.C. 703-712) (MBTA). This act specifically addresses the "taking" of migratory birds and the exceptions would not include use of the withdrawals for military purposes. All migratory birds, including ospreys, swans, sandhill cranes, and the four passerines listed under the paragraph 4, would be offered protection under the MBTA. Taking can be the result of disturbance as well as habitat destruction. Discussion of the MBTA and potential mitigation to comply with its provisions should be incorporated in the Final EIS.

WILD-AA007

WILD-AA007: The Migratory Bird Treaty Act has been incorporated into Chapter 3.14 and Chapter 4.14.

Vol. I pg. 3-71, top of page, partial para.

"Department" of Forestry should be "~~Division~~" of Forestry.

FIRE-AA006

FIRE-AA006: Change completed.

Vol. I, pg. 3-71, para. 2

The second paragraph states "Through the Reciprocal Fire Protection Agreement and the Annual Operating Agreement, the Department of Forestry has agreed to provide detection and initial attack suppression services for Fort Greely West and East Training Areas which lie within the Department of Forestry Protection Area." To clarify this statement, we suggest the Final EIS reference the 1998 Annual Operating Agreement between the BLM-Alaska Fire Service and State of Alaska Division of Forestry, which states under Section VIII. F.3. Suppression on Military Lands the following: "The DOF agrees to provide detection and initial attack suppression services upon request, and subject to available forces, on military lands. 'No Entry Areas' are excluded. (a) The request will be made by the Military Fire Chief or the AFS Military FMO. All requested detection and suppression costs are reimbursable. (b) The Military Fire Chief at each location will operate as the land manager's representative

FIRE-AA007

FIRE-AA007: The changes have been completed. Please review response to FIRE-NN027.

AA

for the military land on their base garrison/cantonment areas. (c) The BLM is responsible for supplying a land manager's representative for military lands outside of the garrison/cantonment areas."

Vol. I, pg. 3-71, para. 4

Changes to the fire management (protection) options can be made between September 30 and March 31, as established in the Alaska Interagency Fire Management Plan, not September 30 and March 1 as stated here. We suggest this be corrected in the Final EIS.

FIRE-AA008

FIRE-AA008: Change completed.

Vol. I, pg. 3-72, Limited Protection

First word of second line should be "of", not "or".

FIRE-AA009

FIRE-AA009: Change completed.

FIRE-AA010: Change completed.

Vol. I, pg. 3-72

The last paragraph, third sentence is incorrect. We believe the statement must read "The Alaska Fire Service does have responsibility for initial response in these areas" (Delete may or may not have.)

FIRE-AA010

FIRE-AA011: Change completed.

Vol. I, pg. 3-73, para. 2

The 1998 fire #A188 point of origin was on Ft. Greely West Training Area and spread to state managed lands.

FIRE-AA011

ACC-AA018: The Lakes Impact Area includes Kansas, Nevada, Arizona, Oregon, and Michigan Lakes which are shown as Dedicated Impact Areas in Figure 3.16.b. The Texas and Washington Ranges are not part of the Lakes Impact Area but are designated as Dedicated Impact Areas.

Vol. I, pg. 3-78, Section 3.16.1, Applicable Regulations

Last paragraph before the table states that sections of the Lakes Impact Area are closed during military training. We recommend a description of this area be included. Is this the area on the map 3.16.b as dedicated impact area? Does it include Texas and Washington Ranges?

ACC-AA018

Vol. I, pg. 3-79, Section 3.16.2, Other Closed Lands, para. 3

We suggest including a justification for the closure of the Fort Greely West Training areas.

ACC-AA019

ACC-AA019: The Fort Greely West Training Area is not closed to public access. An area between Meadows Road and the Mississippi Impact Area is closed to the public for safety. The Meadows Road Area was closed in approximately 1990 because the Department of Environmental Hygiene from Aberdeen Proving Ground, Maryland, surveyed the area and identified it as a Laser Range. The military fires lasers from that area into the Mississippi Impact Area. The Laser Range has also been identified as a "No Notice Exercise Area". Troops on call can immediately be deployed to the area for training.

Vol. I, pg. 3-87, Section 3.18, Cultural Resources, para. 2

It should be noted that the military installations of Ft. Egbert at Eagle, AK (1899-1911) and Ft. Gibbon at Tanana, AK (1899-1923) were established in interior Alaska prior to March 31, 1937.

CULT-AA003

CULT-AA003: This information has been included in Chapter 3.18.

Vol. I, pg. 3-103, Section 3.19.5, Mineral Resources

We suggest that coal also be mentioned as one of Alaska's important resources.

MIN-AA017

MIN-AA017: No change.

Vol. I, pg. 3-107, para. 5

The first sentence should read "of two lower Tanana banks ~~bands~~."

SUB-AA007

SUB-AA007: Corrected in Final LEIS.

Vol. I, pg. 3-108, para. 1

The Yukon Training Area is within the Fairbanks North Star Borough, but this does not make it exempt from subsistence preference under ANILCA Section VIII. Residents of the Fairbanks North Star Borough are not rural residents and therefore are not qualified Federal

SUB-AA008

SUB-AA008: Chapter 3.20 and 4.20 have been updated to include this information.

AA

subsistence users. However, Game Management Unit 20B, within which this withdrawal lays, has several seasons and bag limits for Federal subsistence hunters (these overlap entirely with the current state bag limits and seasons). For example, residents of Nenana and Tanana are qualified subsistence hunters for moose on Federal lands in GMU 20B. In practice, residents of Nenana and Tanana probably do not travel to the withdrawal to harvest subsistence resources. We suggest this be clarified in the Final EIS.

Vol. I, pg. 3-108, para. 3

ANILCA Section VIII defines qualified subsistence users as all rural residents. Customary and Traditional determinations further refine who is qualified where, if resources are limited. We suggest deleting the reference to non-native in the last phrase of the final sentence in this paragraph. All residents of the Delta communities are qualified subsistence hunters. There is subsistence use of Ft. Greely lands under the intent of ANILCA Section VIII. We believe that the withdrawal of these lands for military purposes causes a reduction in the availability of or access to subsistence resources, and that triggers the need for an 810 subsistence hearing in the affected communities. (See comments on Section 4.20.1, page 4-71.)

Vol. I, pgs. 3-112 and 3-114, Figures 3.1.a and 3.1.b

We suggest that the reference on legends that withdrawal for Army and Air Force comes “from BLM” be deleted. The BLM processes the paperwork associated with withdrawals and the land remains Federal land.

Vol. I, pg. 3-120, Figure 3.4.a; Geology Map, Fort Wainwright

More detailed information about the age of the units is given in this legend than is in Weber et al., 1978. This discrepancy should be clarified.

We believe the text for the unit Pzs should say the rocks are metamorphosed to amphibolite facies not greenschist facies. A reference is needed to substantiate the differentiation between units Pzs and Pzg on figure 3.4.a. These were both shown as Pzs on Weber et al., 1978, and it is unclear why the former unit is shown to be schistose and the latter unit to be gneissic. A reference is needed for the age of unit Pzsg.

We suggest that faults be added to this figure, specifically the one which is shown by the linear or termination of the medium grain and rust units along the eastern margin of the training area.

Vol. I, pg. 3-121, Figure 3.4.b, Geology Map, Fort Greeley, legend

We suggest the reference to Foster et al., 1987, should be replaced with Foster et al., 1994, the most recent work. The reference Nokleberg et al., 1990, is not in the references in the back, but should nevertheless be replaced by Nokleberg et al., 1992, shown above.

Vol. I, pg. 3-123

We recommend that a narrow area along Buchanan Creek from the green-colored area to the confluence with the Little Delta River should be circled and stippled as an “area with favorable Geology for Placer Gold.”

SUB-AA009

SUB-AA009: The term “non-native” has been removed and changes made to Chapter 4.20.

LAND-AA012

LAND-AA012: Please refer to Figure 3.1.a and Figure 3.1.b. Changes to the figures have been made regarding your suggestions.

GEOL-AA005

GEOL-AA005: The descriptions were reviewed and found to be consistent with Weber et al. (1978) and the other references cited on Figure 3.4.a. Note, however, that the USGS (1998) reference should be cited as Wilson et al. (1998). Appropriate corrections have been made on the drawings and in Chapter 6.

The Legend for Figure 3.4.a. has been changed to indicate amphibolite facies for the Pzs unit. The boundaries of the Pzs and Pzg units have been corrected on Figure 3.4.a and are now consistent with Weber et al. (1978). However, the schistose and gneissic descriptions of Pzs and Pzg, respectively, are consistent with the map sources. Finally, Weber et al. (1978) observe that the Pzsg unit may be stratigraphically equivalent to the Totatlanika Schist, which is Middle Devonian to Early Mississippian (Wilson et al. 1998).

Faults have been added to Figure 3.4.a as suggested.

GEOL-AA006

GEOL-AA006: The geologic map in Foster et al. (1987) was the source used for Figure 3.4.b. The 1994 reference is primarily text and does not contain a comparable map. The reference to Nokleberg et al. (1990) is correct, but the citation in the Bibliography was erroneously labeled 1996. The suggested Nokleberg et al. (1992) reference was not used in preparing this figure.

MIN-AA018

MIN-AA018: Without documentation to support this request, changes to Figure 3.4.b have not been incorporated.

AA

Vol. I, pg. 4-1, Section 4.1, Land Use

The third paragraph should have the following sentence added for clarification: "... the State. **Until conveyed to the State, BLM will manage the natural resources in accordance with the existing Resource Management Plans (but not the MOU).**" **LAND-AA013**

This is also true for the fourth paragraph which would benefit from the addition of the following: "... (1991) management area. **After conveyance to the State (if any),** management and use of the withdrawal..."

Vol. I, pg. 4-7, para. 5

Third line states that ice fog is a unique type of atmospheric pollution. It is not pollution - it is an atmospheric condition - this should be corrected. In the seventh line it says fog is formed by particulate by-products. It is also formed by dust (the reason larger particles of sand are used on the roads - not ash). We suggest this be corrected in the Final EIS.

AIR-AA002

LAND-AA013: Added sentence on management of the withdrawal lands by the BLM under the existing Resource Management Plans if the No Action Alternative is implemented.

AIR-AA002: Please refer to Chapter 3.2.2 *Ice Fog* and Chapter 4.2.2 *Ice Fog*. Amendments to the text have been made regarding your suggestions.

Vol. I, pg. 4-8, para. 2

This section indicates military activities will remain the same. A more accurate statement might be: "**As long as** military activities **remain at the same level**, following the land withdrawal renewal..."

AIR-AA003

AIR-AA003: Please refer to Chapter 4.2.2 *Ice Fog*. Amendments to the text have been made regarding your suggestions.

Vol. I, pgs. 4-8 and 4-9, Sections 4.3, Terrain, and Section 4.4, Geology

We believe these topics should be placed in the affected environment section, not in the environmental consequences section, unless the proposed withdrawals will adversely impact terrain and geology.

OTH-AA027

OTH-AA027: Please refer to Chapter 3.3 *Terrain* and Chapter 3.4 *Geology* for a discussion of the affected environment of these resources.

NEPA requires the disclosure of environmental consequences even if they are negative declarations.

Vol. I, pg. 4-9, Section 4.5, Mineral Resources

We suggest this information be quantified, for example, how many acres and where?

MIN-AA019

MIN-AA019: It is not clear which "areas" the commentor is discussing. It is premature at this point to designate specific areas for mineral sale or location.

Vol. I, pg. 4-10, Section 4.6 Soils

This section notes that there is no information is available for Fort Wainwright and little is available for Fort Greely. We suggest that the Final EIS discuss plans for additional studies, such as those identified on pages 4-16 and 4-18, especially for Fort Wainwright.

SOIL-AA005

SOIL-AA005: A series of baseline and long-term monitoring programs have been proposed in this LEIS to determine the location, extent, and potential migration of contamination in soils (see Chapter 4.23).

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

Vol. I, pg. 4-12, Table 4.6a

If the information is available, it would be helpful to provide in the Final EIS the amount of ground pressure exerted by each type of vehicle in terms of pounds per square inch.

SOIL-AA006

SOIL-AA006: Information regarding vehicle ground pressure in pounds per square inch was unavailable. Please refer to Table 4.6.a for additional information.

Vol. I, pg. 4-15, para. 5

"Brush or forest fires ignited by munitions released during training operations, although considered rare events, could occur and would result in some loss of vegetative cover." This statement conflicts with the data provided on page 3-76 "Table 3.15d Total Number of Fires by Cause on Fort Greely (1954-1997)." Incendiary fires are listed as 58 total, for an 86 percent of total acres burned.

FIRE-AA012

FIRE-AA012: "Although considered rare events" has been deleted.

Vol. I, pg. 4-17, para. 6**AA**

We believe the statement "Brush or forest fires ignited by flares released during training operations although considered rare events, could occur and would result in some loss of vegetative cover" conflicts with the data provided on page 3-76 Table 3.15d, and should be corrected.

FIRE-AA013**Vol. I, pg. 4-20, Section 4.6 Soils**

The No Action Alternative section on page 4-20 talks about farming and new settlements. We believe that, after examining the percentage currently planned for these uses on adjoining lands, the scenario for future farm settlement is unrealistic and should be revised to a more realistic scenario.

SOIL-AA007**Vol. I, pgs. 4-10 through 4-21, Section 4.6 Soils**

This section discusses the types of impacts that may occur to the soils of the area. However, neither this section nor chapter 3 makes any attempt to discuss the current level of effects that have occurred or what will occur under the preferred alternative. For example, no reference is made to the acres of soil disturbance that currently exist or will be disturbed through use or construction of roads and trails, acres of impact area, or acres of maneuver area(s), etc. We suggest this type of information be presented, at least in part, to properly outline direct effects.

SOIL-AA008

Section 3.6.1 discussed soil limitation ratings for various soil types. However, no attempt was made to quantify the impacts to various soil types within chapter 4. We suggest this be corrected in the Final EIS.

Vol. I, pg. 4-31, Section 4.9, Groundwater Resources

Groundwater is a major drinking-water supply for the area residents. We believe that the Final EIS should have more information is necessary to protect this resource and that information is needed on the quality of water, subsurface aquifer conditions, and the interaction of surface and ground waters in the area (see also pg. 4-33, Proposed Mitigation).

WATER-AA012

The groundwater quality data for the Draft EIS are not consistent in time of sampling, and hence, outdated. The groundwater data cannot be compared for trends because the sampling dates are 40 to 50 years old and sparse. One sample per site is taken and this is not sufficient to characterize present day water quality. We believe that the Final EIS should contain the results of many more samples and sites, which are necessary to best ascertain current trends in water quality. The sampling interval in the well must also be identified.

Vol. I, pg. 4-38, para. 1

We suggest that this paragraph more appropriately belongs in Section 4.14.

VEG-AA003**Vol. I, pg. 4-40, para. 1**

The statements: "Fire from military activities impacts vegetation. Vegetation in these areas is kept in varying successional stages, maintaining diversity of vegetation composition. A greater number of fires occur on the withdrawn lands due to incendiary devices" appear to conflict

FIRE-AA014

FIRE-AA013: "Although considered rare events" has been deleted.

SOIL-AA007: Changes have been made to Chapter 4.6 regarding your suggestions.

SOIL AA008: Quantitative data is not available on the extent of damage occurring from military vehicle maneuvering on Fort Wainwright Training Area and Fort Greely. Training area 4 on the Fort Wainwright Yukon Training Area (Figure 2.b) was used most frequently during 1995 and 1996 (Table 2.f). Training Area 22 on Fort Greely (Figure 2.c) was used most often during 1988 to 1995 (Table 2.g). The most severe terrain damage from off-

road maneuvering would be expected to occur during the summer months when the ground is not frozen. However, due to Army regulations which restrict 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), impacts would not be expected to reach the highest severity level. Personnel are also instructed to operate vehicles on marked trails and designated routes until directed otherwise during tactical deployment.

Quantitative data representing the damage caused by munitions use within Stuart Creek and Oklahoma/Delta Creek Impact Areas are not available. In general, projectiles contain high explosive compounds that detonate upon impact with the ground, creating a crater and distributing steel fragments across the local landscape. Over time, large areas of bare ground result. This could lead to localized episodes of wind and water erosion similar to the disturbance caused by off-road maneuvering. The soil profile may contain embedded shrapnel making removal of the foreign material difficult. Evidence of long-term use of the Impact Areas include thousands of craters, debris from used targetry, pieces of shrapnel, and occasional unexploded ordnance.

Please refer to Chapter 4.6 *Soils* for a complete discussion of this topic.

The Soil Limitation Ratings as described in Chapter 3.6.1 were not used as an analysis tool because they provide only a general description of the soils in the area. The ratings were not developed specifically for military activities, but rather for general land use categories. Also, some soils within any mapped area may have properties and limitations that differ from those described for the unit as a whole, which makes the evaluation of a specific, localized land use difficult.

Military activities conducted on the withdrawal renewal lands would be consistent with those conducted during the past 15 years (see Chapter 2.1.3). The Army is proposing to renew the withdrawal areas with the existing military land uses. The Army is not proposing to expand or add Impact Areas on the withdrawal lands.

A planning-level soil survey is scheduled to be completed for the withdrawal areas. This project includes the identification and mapping of soils, the correlation of soils to permafrost areas, and the establishment of relationships between terrain components. While describing, classifying, and quantifying soil properties, relationships among geomorphology and vegetation will be established.

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. The goals of ITAM are to evaluate, repair, maintain, and enhance training lands at Army training installations. Please refer to Appendix 2.D for a detailed description of the ITAM program.

WATER-AA012: Please refer to Chapter 3.9.1 *Groundwater Occurrence* for a description of location, recharge, discharge, and surface water interactions of groundwater of the withdrawal areas.

An effective comparison between surface water and groundwater quality cannot be made with the limited data available. This is due to the lack of lengthy, historical surface and groundwater quality records for both Fort Wainwright and Fort Greely. Additionally, surface and groundwater sample locations are not necessarily in the same areas to allow for analyses.

No groundwater monitoring wells have been drilled on the Fort Wainwright Yukon Training Area or the Fort Greely East and West Training Areas. Thus, no groundwater quality data are available for the Impact Areas. An analysis of background water quality samples as related to "other samples" is not possible due to lack of data 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.

VEG-AA003: The paragraph has been added to Chapter 4.14.

FIRE-AA014: "Although considered rare events" has been deleted.

AA

with pages 4-15 and 4-17, where brush and forest fires ignited by munitions are considered "rare events." We suggest this be clarified in the Final EIS.

Vol. I, pgs. 4-34 to 4-41, Sections 4.10, Wetlands, and 4.11, Vegetation

See above comments to Section 4.6. We suggest, to adequately define direct impacts, that the acres of disturbance, present or future, be quantified.

Vol. I, pg. 4-41, Cumulative Effects

The cumulative effects of negative impacts on vegetation and other resources is an important consideration in the length of time for which the withdrawal is renewed. A 15 or 20 year renewal period would be more reasonable (than 50 years) and would allow better assessment of cumulative effects. We suggest this be considered in the Final EIS.

Vol. I, pg. 4-42, para. 5

We believe it would be more appropriate to cite studies on Alaskan wildlife species, rather than mule deer and penguins, which are not found in interior Alaska.

Vol. I, pg. 4-42, para. 5

Studies of Adelie penguin reactions to sight and sound of aircraft demonstrate that the type of disturbance anticipated on these withdrawals can cause mortality to birds that is additive to other mortality factors. However, we believe that studies which are more pertinent to the potential disturbance(s) to birds present on these withdrawals would be more appropriate and need to be added.

Vol. I, pg. 4-48, Section 4.12, para. 1

We suggest including birds (trumpeter swans, raptors) to the noise reduction study in sentence 4 of mitigation.

Vol. I, pg. 4-48, Section 4.12, para. 2

Breeding Bird Surveys are not the appropriate tool for identifying habitats or high use areas for birds since the BBS monitors trends in populations. We suggest using intensive off-road point counts designed to identify habitat use. Studies designed to identify high use areas include several nest searching techniques, habitat mapping, and other methods for characterizing the interactions of birds and habitat.

Vol. I, pg. 4-49, para. 2

It is speculative to assume that disturbance to wildlife from public activities, including recreation, commercial use, and development, would increase over present disturbance from military activity. We suggest the Final EIS substantiate these statements.

Vol. I, pg. 4-49, Section 4.12, para. 1, last sentence

We suggest relating this sentence to the study conclusions about Off Road Vehicles use and wildlife.

WET-AA002
VEG-AA004

OTH-AA028

WILD-AA008

WILD-AA009

WILD-AA010

WILD-AA011

REC-AA006

REC-AA007

WET-AA002: The distribution of wetlands within the withdrawal areas is presented in Chapter 3.10 and Appendix 3.10.A. Knowledge of the areal extent of wetlands in the withdrawal areas is limited. From the data that are available, it is apparent that wetlands exist within Impact Areas, Training Areas, and along floodplains and stream corridors (Figures 3.10.a and 3.10.b).

Typically, the density and inundation with water of wetland areas prevent maneuvering during much of the time. Even though off-road military exercises are regulated, some disturbance may occur. The military may maneuver or conduct foot traffic in wetland areas as long as the wetlands are not disturbed. If wetland areas are disturbed, Clean Water Act Section 404 requirements must be satisfied.

Current knowledge regarding the status of wetlands located within the withdrawal boundaries is based upon the U.S. Army Corps of Engineers permitting system. According to Section 404, wetland modification will occur only in designated areas with the acceptance of a permit application. A total of 114.86 acres, based on U.S. Army Corps of Engineers permitting records, have been disturbed by military activities since 1989 as shown in Table 4.10.a.

These permits usually contain special provisions which require the permittee to correct any damage to the wetland system. A wetlands management scheme is currently being developed for the withdrawal areas, which includes a wetlands management plan, Section 404 Consultations, and remediation of wetlands damage including revegetation.

An increase in impacts to wetlands are not expected to occur, since proposed military activities would be consistent with those conducted during the past 15 years, the Army is not proposing to expand or add Impact Areas, and various wetland damage mitigation measures are planned.

VEG-AA004: At the present time, the total number of acres directly impacted by military activity has not been quantified. Little disturbance has occurred on the Fort Greely West Training Area. Army Regulations and applicable State and Federal laws decrease impacts to vegetation. Based on the U.S. Corps of Engineers wetland permit application system, a total of 114.86 acres have been recorded as disturbed by military activities since 1989 (Table 4.10.a).

OTH-AA028: Noted.

WILD-AA008: The reference to mule deer and penguins has been deleted.

WILD-AA009: The reference has been deleted. Please review the information in Chapter 4.12 on sandhill crane and migratory birds, and Chapter 4.14.

WILD-AA010: These species are covered in the Proposed Mitigation for Chapter 4.14.

WILD-AA011: The intent of the statement was to have the military use existing data. All baseline studies begin with the analysis of existing information. The Breeding Bird Surveys could prove useful. Chapter 4.14 also lists Proposed Mitigation that requires the Army to identify habitat. Your recommendations for specific studies should be presented in the review of the Integrated Natural Resources Management Plans.

REC-AA006: The statement is justified. It is not stating that recreational activities would cause greater disturbance to wildlife than military activities. The statement says that when military presence is absent there could be an increase in recreational activities. This is documented by the input on access and recreation given during the scoping process. The increase in recreational activities would include a higher probability that there would be an increase in recreational-caused disturbance to wildlife on the withdrawal lands than at the present time because military activity restricts recreational activities in some areas.

REC-AA007: Noted.

AA

Vol. I, Chapter 4.13.2, Wild Fisheries

There is an insufficient database to adequately assess impacts to fisheries resources in the Stuart Creek Impact Area. It is a well known fact among fisheries scientists that explosives discharged in or near water bodies can kill fish directly by the explosion and shrapnel and indirectly by the shock waves that are propagated. Incubating eggs can also be destroyed by the effects of shock waves. The BLM routinely mitigates for the use of explosive charges used in seismic oil exploration activities by using buffer setbacks adjacent to fish-bearing water bodies. The use of munitions is described on page 2-22 and elsewhere. Direct impact of munitions is mentioned in several sections, including page 4-15, which discusses the creation of craters in the soil. There is no acknowledgment in this document of the kinds of shock impacts just mentioned nor mitigation for these impacts on fishery resources. We recommend that this be added to the Final EIS.

FISH-AA005

FISH-AA005: Yes, there is insufficient data to assess impacts to fisheries within the Stuart Creek Impact Area. The military does not intentionally shoot into water bodies. It is not feasible to create Buffer Zones along waterways within the Impact Areas. The Air Force Environmental Assessment for Target Arrays states that targets cannot be placed within 50 feet of flowing water. Army Regulation 350-2 states that the military cannot fire into or over navigable waterways.

One of the impacts mentioned in the Draft EIS is explosives damaging stream banks in the riparian zone of the upper Chena drainage. Site-specific fishery surveys have not been conducted in this area and this fact is acknowledged in page 4-54. Because it is generally known that the South Fork Chena River supports populations of both resident and anadromous species, and because of the acknowledged heavy use of the area as a bombing range, it is reasonable to analyze a worst case scenario and conclude that significant impacts to fish populations may occur, but are not currently documented. Correspondingly, mitigation for these impacts is not discussed either. We suggest mitigation include the establishment of buffer areas of one-quarter mile on either side of major water bodies such as the South Fork, Beaver Creek, and Stuart Creek. Stream and waterbody buffers would also provide additional protection to many other species, especially moose that make intensive use of riparian zones for feeding and other activities.

Vol. I, pg. 4-53, para. 6

There are currently no BBS routes conducted on Ft. Greely (see page 3-60), this should be corrected.

WILD-AA012

WILD-AA012: Change completed.

Vol. I, pg. 4-54, para. 2

No BBS are conducted on Ft. Greely, so detection of ospreys on this withdrawal must be by some other method. We suggest this be explained in the Final EIS.

WILD-AA013

WILD-AA013: Noted.

Vol. I, pg. 4-54, para. 5

According to the Draft EIS, trumpeter swans have not been identified on the Ft. Wainwright Yukon Training Area; however, it is not clear to the reader whether or not surveys of trumpeter swans have been conducted on Ft. Greely East and West Training Areas. If swan surveys have not been conducted, we believe they are needed, and should be discussed in the Final EIS.

WILD-AA014

WILD-AA014: The U.S. Fish and Wildlife Service conducts swan surveys on Fort Greely every five years. Chapter 4.14 *Proposed Mitigation* identifies that surveys are needed for sensitive species.

Vol. I, pg. 4-57, Section 4.15, Fire Management

We suggest it should be made clear that fire management and suppression on withdrawn lands by the Alaska Fire Service refers only to wildland fires.

FIRE-AA015

FIRE-AA015: All fires on the withdrawal lands are the responsibility of the Alaska Fire Service. This is stated in the first sentence of Chapter 4.15. If you are referring to other military land such as the cantonment areas, they are not part of this withdrawal.

AA

Vol. I, pg. 4-57, para. 6

The statement: "Of the seven known causes of fire on Fort Wainwright Yukon Training Area and Fort Greely, incendiary devices are the major cause of fire on withdrawn lands with lightning being second" appears to conflict with pages 4-15 and 4-17 where fires are considered "rare events." This should be resolved in the Final EIS.

FIRE-AA016

FIRE-AA016: "Although considered rare events" has been deleted.

Vol. I, pg. 4-58, para. 2

The second paragraph states: "It is possible that fires started on withdrawn lands could cross protection status boundaries into areas managed by the State, which could have different protection status. However, fire information for the withdrawn lands shows that out of 95 incendiary device fires, only one has crossed onto State lands indicating that the probability of this occurrence is low." While this statement may be true, such occurrences can be very costly. For example, the 1998 Carla Lake Fire started on Military Lands (modified protection) and crossed over onto State lands (full protection). This fire was caused by lightning; however, unexploded munitions in the area hampered ground based suppression activities during the first days of fire suppression efforts. After crossing over onto State of Alaska lands, the cost of the fire was over \$15 million dollars. We suggest this be further discussed in the Final EIS.

FIRE-AA017

FIRE-AA017: Noted. Please review Appendix 3.19.D.

Vol. I, pg. 4-58, 4.15, para. 3

This paragraph is unclear. The fire management options (protection) would not alter the lands from their intended military use. The fire management options were developed jointly by BLM-Northern Field Office and the U.S. Army-Alaska to best accommodate natural resource values and the military mission. Modified lands may, on a case by case basis, be treated with different levels of attack but Critical (and Full) would be initially attacked aggressively. This paragraph should be clarified in the Final EIS.

FIRE-AA018

FIRE-AA018: The paragraph does not indicate an alteration of the lands from their intended military use. It states that fires could cross military boundaries onto State lands. The following sentence has been added to the paragraph: "If fires begin in Impact Areas, the cost of suppression could increase because on-the-ground fire suppression in these areas is prohibited."

Vol. I, pg. 4-59, para. 4

The Final EIS should clarify that the Ft. Wainwright Tanana Flats withdrawal is unaffected by this Draft EIS and will continue to be available for military use even under the No Action Alternative. This withdrawal currently receives wildland fire detection and initial attack response from BLM-Alaska Fire Service (AFS) as part of the Interservice Support Agreements (ISSA), which allows the use of the buildings and services on Ft. Wainwright. Use of buildings and services by BLM-AFS may be altered if less land is protected by BLM-AFS, but the potential need for the ISSAs will not evaporate.

FIRE-AA019

FIRE-AA019: The lands involved in the withdrawal renewal for this LEIS are defined throughout the document. Please refer to figure ES.a.

Vol. I, pg. 4-59, para. 5

The withdrawals addressed by the Draft EIS are south of a line that delineates Department of Natural Resources (DNR)-DOF areas of protection responsibility to the south from BLM-AFS areas of protection responsibility to the north. Therefore, the No Action Alternative should clarify that DNR-DOF would have responsibility for protecting the former withdrawals.

FIRE-AA020

FIRE-AA020: Please review the first paragraph under the No Action Alternative.

Vol. I, pg. 4-60, Section 4.16, Public Access

We believe the Preferred Alternative needs clarification on this issue. The Draft EIS states that

ACC-AA020

ACC-AA020: The statement has been corrected to state "The Lakes Impact Area and Buffer Zone would be temporarily closed when necessary for military activities. The High Hazard Impact Areas, and the Texas and Washington Ranges would remain off-limits to the public."

AA

the High Hazard and Dedicated Impact areas would be off-limits to the public. While the high hazard area sounds reasonable, the justification for the Dedicated Impact areas, if the military activities are remaining at the same level, is unclear. For example, if all the Dedicated Impact areas are off-limits, where are the Lakes Impact Areas that would only be closed temporarily?

Vol. I, pg. 4-60, para. 3

The Final EIS should discuss other objectives which are met by prescribed fire besides fire hazard reduction, as mentioned in Section 3.15.2, where creating and maintaining maneuver areas is discussed.

Vol. I, pg. 4-60, para. 4

It is unlikely that fuel load would be significantly increased on the withdrawal lands under the No Action Alternative. The fire management options for most of these areas are such that fire will be allowed naturally on the landscape. Fuel loading that results in "hotter burning and crown fires" usually occurs in areas where fire is deferred, such as in Full or Critical areas, not where natural wildland fire is allowed to burn. In the absence of the withdrawals, some Full or Modified areas may be changed to lower suppression levels, allowing more natural fire on the landscape. We suggest the Final EIS further address this fact.

Vol. I, pg. 4-61, para. 6

We suggest adding to general access procedures the normal checking with flight service.

Vol. I, pg. 4-61, Section 4.16, Public Access, para. 7

We suggest that military use be quantified in the Final EIS, including how much it has increased in the last 10, 20, or 50 years of restricted public access. That would be an indicator of how much the public would be impacted in the future. We also suggest identifying any planned studies.

The same comments apply to the following section: 4.17 Recreation page 4-63.

Vol. I, pg. 4-64, para. 5

We suggest including the location of the Valdez winter trail. It should be labeled on Figure 3.13.b and a map reference included at the end of the paragraph.

Vol. I, pg. 4-65, Cultural Resources, para. 3

Lands cannot be transferred as State-selected property to the State; they are ~~conveyed~~ to the State. This should be corrected.

Vol. I, pg. 4-66, Socioeconomics, No Action Alternative

Paragraph 3 should read: "Under the No Action Alternative, non-renewal of the ~~land~~ ~~withdrawal~~ would occur..."

Vol. I, pg. 4-66, Section 4.19, Socioeconomic, para. 3

The No Action Alternative states "extremely limited aspects" of Army and Air Force missions

FIRE-AA021

FIRE-AA021: Chapter 3.15.2 states that prescribed fire is used to improve wildlife habitat, decrease potential for ignitions and fire escape from live firing, and to increase military training areas. This is stated again in Chapter 4.15.1.

FIRE-AA022

FIRE-AA022: The statement on fuel load has been taken out.

ACC-AA021

ACC-AA021: The following statement has been added. "All policies and procedures for civilian airspace access would continue. Civilian pilots should call the Special Use Airspace Information Service (SUAIS), a 24-hour service (1-800-758-8723 or 907-372-6913) provided by Eielson Air Force Base Range Control to civilian pilots planning flights through or around Military Operations Areas and Restricted Areas in interior Alaska. The SUAIS provides information on which MOAs are active, Army artillery firing, and known helicopter operations (USAF 1995)."

ACC-AA022

ACC-AA022 and REC-AA008: Adequate historical data is not available to quantify an increase or decrease in public access over the past 50 years.

REC-AA008**REC-AA009**

REC-AA009: Change completed.

CULT-AA004

CULT-AA004: Corrected in Final LEIS.

SOC-AA012

SOC-AA012: Corrected in Final LEIS.

SOC-AA013

SOC-AA013: To factor costs would be speculative due to economic and technological conditions.

AA

could continue. We suggest the Final EIS discuss these limitations and how much can be transferred to Tanana Flats, what percentage is conducted on Tanana Flats now, and what types would be eliminated.

Page 4-67, paragraph 2 discusses decontamination expenditures. If it costs \$248.9 million to clean up today, we suggest future costs (e.g., 10 and 20 years from now) and planned studies be discussed in the Final EIS.

Vol. I, pg. 4-71, No Action Alternative

We suggest the Final EIS include a more realistic analysis of possible conveyances to the State. We believe it is unlikely that there would be negative consequences in the foreseeable future to subsistence users of the withdrawals if they were conveyed to the State. Seasons and bag limits are aligned between the State and Federal regulations on these withdrawals. Where no Federal subsistence season exists, State regulations provide opportunity for the qualified subsistence user (see comment on Section 3.20, page 3-108, paragraph 1). Opening access to subsistence hunters under either State or Federal management would benefit subsistence users.

Vol. I, pg. 4-71, Section 4.20.1, para. 1

An ANILCA Section 810(a) Evaluation and Finding should be attached to the Record of Decision or as an appendix to the EIS. The evaluation and finding helps make a decision on whether or not the preferred alternative has significant impacts on subsistence use. This section does not adequately meet this requirement and, we believe, should be more fully addressed in the Final EIS.

Vol. I, pg. 4-71, Section 4.20.1, para. 2

Based on ANILCA, continued use of the Ft. Greely withdrawals for military activities does significantly impact subsistence use and may require a Section 810 hearing. Use by the military restricts access to some parts of the withdrawal that might otherwise be used by subsistence hunters. Military activity may also affect wildlife movements, making them unavailable to harvesters. (See comments on Section 3.20, page 3-108.) We believe that the 810 discussion should be revised in the Final EIS.

Vol. I, pg. 4-71, No Action Alternative

In sentence four, we suggest deleting "intensive management" and substituting "~~management~~ activity." Intensive management has a specific connotation in the context of wildlife and fisheries management. Under Alaska Statutes, the Board of Game is required to adopt regulations to provide for intensive management programs to restore the abundance or productivity of big game prey populations important for human consumptive use. Without the support of the Army on these withdrawals, some programs, such as grouse enhancement on the Yukon Training Area and hunter check stations for moose, may be discontinued.

Vol. I, pg. 6-16

"Kiell" is misspelled; it should be "Keill."

SUB-AA010

SUB-AA010: You are correct with regard to access, which is important to subsistence use. Thus, the No Action Alternative in Chapter 4.20 has been changed.

SUB-AA011

SUB-AA011: Chapter 4.20 has been updated to indicate that neither alternative would likely significantly affect subsistence practices on withdrawal renewal areas of Fort Wainwright since subsistence taking of fish and wildlife is minimal or does not occur on the Yukon Training Area. Increased access opportunities that could result from the No Action Alternative are not likely to significantly increase subsistence use of these lands.

SUB-AA012

SUB-AA012: The following changes have been incorporated into the Chapter 4.20. The Preferred Alternative does not change access to these lands for subsistence use over what has occurred during almost 50 years of military use. Approximately 9% of the withdrawn lands are permanently closed to subsistence use due to Impact Area hazards. Compared to use before the military withdrawals, the Preferred Alternative may affect subsistence use of portions of the withdrawal lands at Fort Greely. Some lands are less accessible than would be the case under the No Action Alternative. Military activities may affect some game species behavior to make them less or more available to subsistence users.

SUB-AA013

SUB-AA013: We have removed the term "intensive". The sentence now includes the phrase "...decreased funding and less management of fish and wildlife..."

OTH-AA029

OTH-AA029: Corrected spelling.

BB



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February 6, 1999

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

Dear Ms. Herdrich:

Thank you for this opportunity to comment on the Draft Legislative Environmental Impact Statement (DEIS) for the Alaska Army Lands Withdrawal Renewal. The Northern Alaska Environmental Center is a nonprofit conservation organization with 1,300 members and has been based in Fairbanks since its founding in 1971. We are dedicated to preserving wilderness and natural habitats in interior and northern Alaska.

The Northern Center recognizes the vested interest the U.S. Army has in these training lands. Yet, we would also hope that both the Army and the CEMML in turn recognize the interest we have in preserving the land, water, and natural habitats of interior Alaska. That said, we would like to comment strictly on matters of environmental concern and not necessarily on the larger issue of whether or not this renewal should be granted.

Chapter 4 of the LEIS addresses the "Environmental Consequences" of this lands withdrawal. An assessment of the No Action Alternative on page 4-20 states, "The first evaluation of the returned lands would be an assessment of the extent the lands are contaminated with explosive, toxic, or other hazardous materials." We believe that this should be performed *regardless* of the chosen alternative. Why is this option listed only if the No Action Alternative is chosen? Furthermore, we believe that this "evaluation" of contaminated lands should be only the first step, and that those identified sites should be cleaned up to the greatest extent possible. For example, the LEIS notes that contamination studies do not exist for TNT and RDX. (4-16) These studies should be performed and the contaminated sites cleaned up.

The LEIS notes that some cleanup is "limited by funding and technology." (4-20) If that is indeed the case then the army should not contaminate any sites in the first place. Why should we allow our land, air, and water to be polluted when the army readily admits that cleanup is limited by funding and technology?

It is our understanding that there may be depleted uranium munitions in the Fort Wainwright area. If so, does the army or CEMML have documented evidence of these sites and the extent to which they may be contaminated? It appears that any additional munitions training could

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RESPONSES TO COMMENT BB

MIT-BB014

MIT-BB014: 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). The Military Lands Withdrawal Act states the decontamination process to follow in order for the military to relinquish the lands to the BLM. Please refer to Chapter 2.1.2.

MIT-BB015

MIT-BB015: Unfortunately, events that occurred in the past cannot be taken back or erased. However, these actions can be remediated.

POL-BB012

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). Current decontamination efforts are described including an ordnance cleanup history by the Air Force (response to POL-A002 and Appendix 2.C).

POL-BB012: Presently, Fort Greely ranges do not allow depleted uranium use. The Cold Regions Test Center has no depleted uranium testing program scheduled for the future and is not aware of any programs in the past. Depleted uranium testing would require completion of an Environmental Assessment or Environmental Impact Statement under NEPA.

conceivably strike these deposits of depleted uranium and thus scatter them into the air and ground water supply. We request that this issue be adequately addressed and if found to be a legitimate problem that the sites be cleaned up.

Simply put, the military has a rather dubious reputation in Alaska for pollution, contamination, and worse yet, failure to clean up their messes. We believe that this issue should be at the forefront of *any* debate as to whether or not the lands withdrawal should be renewed. This is a very complicated issue, to be sure, but it can be simply stated as such: the army should be required to identify all polluted sites – regardless of the pollutant – and then be required to clean them up. If the “funding and technology” do not allow such a cleanup procedure, then a strict moratorium should be placed on any additional activities which might contribute to that pollution problem.

We also believe that the preferred alternative of a 50-year renewal represents too long a time period. This is an unprecedented length for such a renewal. The DEIS states: “The scope of actions would remain virtually the same in comparing renewals for 15, 25, 50, or 100 year increments. Management and use of these withdrawal lands by the military would remain the same under each time period. *The 50-year withdrawal is the preferred selection.*” (ES-6, emphasis added) Why exactly is the 50-year withdrawal the preferred selection? The DEIS gives no rationale for this decision and indeed it seems all the more incongruous when the DEIS admits that the scope of actions would be the same and the management and use of the lands would be the same under any of the considered time periods. So what makes the 50-year renewal so attractive?

There are many reasons why the 50-year renewal is *unattractive* however. Data from fish and wildlife studies change every 10 years. By granting the 50-year renewal you are effectively locking out the public from issues of resource management on these lands. No one knows what the needs will be for fish and wildlife management 50 years from now, or even 10 years from now. Suppose that 10 years from now there is a significant crisis regarding salmon in rivers within the army training lands. If the renewal is granted for only 10 years there will be sufficient opportunity for public involvement in that crisis. But if the lands are locked up for 50 years, what recourse exists for proper management of those rivers?

Furthermore, what evaluations of the pollution status of the lands will be undertaken during those 50 years? Any? If the renewal is granted for 10 years there will conceivably be a thorough study before the next 10-year renewal. It is ludicrous to give the military carte blanche for 50 years, turn our heads for that length of time, and *then* figure out how much air, land, and water they have contaminated. We should instead stagger these renewals so that an incremental evaluation of the contaminants may be performed. If the DEIS admits that actions, management, and use by the military would remain the same over any of the time periods, then we believe that a series of shorter renewals are favorable to a lengthy single renewal.

Another impact which we believe was not adequately addressed in the DEIS is the socioeconomic effects. The DEIS states: “No adverse impacts are expected if the withdrawals are renewed.” (4-66) This is a terribly optimistic, sanguine, and wishful assessment on the part of CEMML. Without documenting specifics, the local newspaper reports on a fairly regular

MIT-BB016

MIT-BB016: Please refer to responses for POL-A001 and POL-A002. Proposed mitigation would implement a research program to gather baseline data to develop a long-term monitoring and remediation program for all physical resources (see Chapter 4.23). Current decontamination efforts are described including an ordnance cleanup history by the Air Force (Appendix 2.C).

ALT-BB056

ALT-BB056: 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-BB057

ALT-BB057: Army management of the withdrawal lands will be conducted under Integrated Natural Resources Management Plans (INRMP) developed in accordance with the Sikes Act. INRMPs are reviewed every five years with public, and State and Federal agency participation in the development and review process.

ALT-BB058

ALT-BB058: See Proposed and Existing Mitigation in Chapter 4.23.

SOC-BB014

SOC-BB014: 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.

BB

basis instances of robbery, vandalism, and even rape committed by soldiers who are stationed at one of the local bases. It seems interesting - and upsetting - that the DBIS goes into great detail about the positive effects of our military presence, including jobs and revenue, yet the DBIS dismisses all negative impacts with this one-liner of sentence quoted above. We strongly request that CENMML undertake a more thorough examination of these impacts in the Final EIS.

Again, thank you for the opportunity to comment.

Sincerely,



Rosa Coen
Witness Campaign Coordinator

CC

Alaska Army Land Withdrawal Comment/Consens Submittals

Monday, 8 February 1999

Name: Mark A Waites
Organization: Self
Address: 1713 Central Ave.

Fairbanks, AK 99709

Comment:

Being an Alaskan resident for the greater part of my life and also be a U.S.A.F. veteran I can see the importance of the militaries continued use of the selected land. What I do not agree with is, I am not in favor of this type of land withdrawal which will not be reviewed for 50 years. I won't be on earth 50 years from now and my 25 year old son will be 75 years old and how old will my grand children be before they ever have a chance to again review this land usage. The military has no idea what its' needs might be 50 years from now. They really do a very poor job of figuring out what they want to do in the next few years. I am against this withdrawal if it ties up the land for over 20 years without a complete review.
Thanks

ALT-CC059

RESPONSES TO COMMENT CC

ALT-CC059: 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.

Name: Judy Hicks **DD**

Organization:

Address: P.O. Box 1417

Delta Jct., AK 99737

Comment: Judy G. Olson Hicks
PO Box 1417
Delta Junction, AK 99737
Checkpoint@knix.net
4 Feb 99

Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Colorado State University
Fort Collins, CO 80523-1500
<http://www.cemml.colostate.edu/alaskaeis>

Dear Ms. Herdrich,

☐ I cannot support the proposed fifty year Alaska Army Lands Withdrawal Renewal of the Training and Impact Areas of Fort Greely. Fifty years is too long of a period. The realignment of Fort Greely to Fort Wainwright yanks the Delta area economic base along with it. The proposed land withdrawal renewal further restricts the regions efforts to develop other economic potentials such as mining and tourism. In addition, it is clear from the Draft Legislative Environmental Impact Statement (LEIS) that environmental, resource and economic studies are lacking. More data is needed for the army, state and federal agencies and area residents to form informed plans and decisions on the army's impact, restoration and restitution efforts. I do believe however, that an effective fifteen year agreement could be drafted.

☐ The BRAC realignment of Fort Greely cannot be separated from the renewal of land withdrawal. The military may plan to use the training and impact areas at Fort Greely in the same manner as they have been used since 1986 (the last renewal of lands withdrawal). During this period of time the Army and Delta Junction have enjoyed a positive relationship. However, even though the military's land use may remain unchanged, without the support of the staff stationed at Fort Greely the risks to the community are greater. Following are three examples. (1) Fire management-- The same number of incendiary munitions may be fired on withdrawn lands but there will be a smaller fire crew to monitor and deal with fires. Incendiary devices start a majority of the fires in the area. (2) Off site range control-- Suggested off site range control will prove ineffective. Currently, as required, my husband and I call the MP desk on post to "call in" when we use the trail network in the Delta East Training Area for dog mushing, hiking, snow machining, hunting, etc. The MP's are always aware of training activities and current weather conditions and would be alerted to respond in case of an emergency. It is difficult to believe that civilian compliance with the "call in" protocol will be maintained if it involves a long distance phone call or that safety and knowledge of the local terrain can be provided long distance from Fort Wainwright. (3) Mobilization of troops from Fort Wainwright-- Moving troops from Fort Wainwright to Fort Greely Training Areas to conduct training exercises is likely to increase following the completion of realignment. The military convoys on the highway pose a safety hazard. Impatient drivers execute risky passes and safe drivers must make many passes on a rough highway or arrive late. In addition, convoys can deter tourist traffic from traveling to Delta. These and other issues of BRAC realignment,

RESPONSES TO COMMENT DD

ALT-DD060: Noted. Refer to Chapters 1.2 and 2.1.3 for a discussion of the military's continuing need for the withdrawal lands.

ALT-DD060

FIRE-DD023: 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 contacts the Bureau of Land Management, Alaska Fire Service (AFS). The ability of the Fire Department to report locations of wildland fires will not change after the realignment.

USE-DD039: No decision has been made on retaining Range Control and Explosive Ordnance Disposal personnel at Fort Greely after the realignment becomes final in 2001. The current proposal after BRAC action is completed, is for local Range management personnel to remain at Fort Greely to continue to provide these services. Also see Access Chapters 3.16 and 4.16.

FIRE-DD023

USE-DD039

OTH-DD030

OTH-DD030: 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.

DD

that did not exist in 1986 for example, affect decisions concerning current renewal. As a local resident it is difficult to be told by the Department of Defense that Fort Greely's mission is no longer important enough to be cost effective and therefore the base was selected for realignment; while on the other hand the Department of Defense and U.S. Army Alaska cite the necessity of Fort Greely's for cold weather and big training spaces for testing, training, flying and bombing, and that all this is vital to prepare our national defense. If the Army believes their arguments for a 50 year land withdrawal for Fort Greely are so strong, then why are they not also strong enough to maintain the small supporting Army post? If Fort Greely's cold weather mission and big open spaces are critical to the Army, then why was Fort Greely realigned rather than Fort Richardson? It cannot work both ways.

□ Fifty years is too long for a land withdrawal. The Draft LEIS offered no explanation why 15 and 25 (or 100) year withdrawal renewals were eliminated as alternatives. The argument for the 50 year renewal as the preferred alternative is that the military has been in the region already for about 50 years. Does it follow then that the next renewal request will be for 100 years and then 200, 400 etc.? This is no justification for a 50 year renewal. Who can predict the local economy much less the technology of defense systems for 50 years into the future. How can I condone 50 years of land withdrawal when I have no concept of what type of impact military testing will have on my grandchildren and when no guarantee of public access to traditional hunting grounds or mushing trails are being offered in return?

□ Too little information exists to make an informed decision for a 50 year land withdrawal. Information about to what extent economically viable resources are being withdrawn from the state and public sector is poor. How can the Army and local governments feel assured that the Army is adequately compensating the local economy for this potential economic development, when no one really knows what exists? According to the LEIS, "The economic impact of continued closure is difficult to estimate. Withdrawal areas have high potential for placer gold, and some potential for lode gold and other mineralization associated with intrusive rocks." With the recent substantial gold discoveries just north of the Fort Greely Training Areas the mineral potential should not be overlooked. In addition, the LEIS reports, "Exploratory work for oil and gas has not been done on the military lands." Yet the Mid Tanana Basin holds a high potential for natural gas and oil. Companies have expressed interest in and explored this same geologic formation near Lake Louise outside of Glenallen. If DoD withdraws these lands, then studies should be done to determine what is there. An effort should be made to compensate the community for the lost opportunity for economic mineral development, or the Army should work out an agreement in writing allowing for mineral exploration and mine development.

□ There is not even enough data to determine if the Army has been environmentally responsible thus far. The LEIS states that the Army is required to protect the environment to the best of their abilities. "All actions taken by the Army are required to consider their impact to the surrounding environment and to take certain precautions to avoid impact." Yet on the topic of wild fisheries the LEIS comments, "No fish population surveys have been conducted on Fort Wainwright Yukon Training Area and Fort Greely West and East Training Areas. No studies have been conducted to analyze impacts from military operations." How can the Army claim to be protecting a resource when the resource itself has not been clearly defined? Inadequate baseline data exists in the area of wetlands as well. The LEIS reports that "Knowledge of the areal extent of wetlands in the withdrawal areas is limited." Apparently in 1992 the National Fish and Wildlife Service surveyed most of Fort Wainwright Yukon Training Area but failed to survey the majority (54%) of Fort Greely's lands. Because wetlands are important habitat for many species and serve a critical role in water quality the Army has a policy to work towards a "no net loss" of existing wetlands on Army lands. How can the Army achieve this at Fort Greely when there is no baseline data of wetland types and acreage? Local Delta pilots report damaging vehicular traffic in the Delta West Training Area, especially in the area of Little Delta River, causing sediment runoff and major vegetation disturbance. Sediment runoff to streams and creeks and a decrease in streamside vegetation can affect both water quality and temperature critical for benthic invertebrate and fish populations. State timber sales just downstream from the Delta West Training Area have been put off due to potential threats to fish populations. Perhaps the Army should pause and evaluate their impacts too.

OTH-DD031

OTH-DD031: Congress determines military base closures and realignments with the President's approval.

ALT-DD062

ALT-DD062: 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. Also see Chapter 2.3.

MIN-DD020: Please refer to Chapter 3.5 *Mineral Resources* for information on the mineral potential of the withdrawal lands.

MIN-D0020

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

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.

FISH-DD006: Proposed mitigation for wild fisheries (Chapter 4.13.2) and the proposed mitigation (POL-A001) for pollution should ensure that the Army identifies fisheries resources and implements management guidelines.

FISH-DD006

WET-DD003: A wetland planning-level survey was recently completed at Fort Wainwright Yukon Training Area, and a similar study is in progress at Fort Greely. A wetlands management and revegetation plan is funded and in progress for the withdrawal lands. Fort Wainwright and Fort Greely Integrated Natural Resources Management Plans are under final review by the Army and BLM which will include specific actions for management of wetland areas. Please refer to Chapter 4.10 *Proposed Mitigation* and Chapter 4.23 *Existing and Proposed Mitigation* for additional information.

WET-DD003

WATER-DD013

WATER-DD013: Noted. Please refer to the response to comment SOIL-A001.

DD

□ There is little socioeconomic incentive for a Delta resident to support a 50 year land withdrawal since the realignment of Fort Greely. The realignment of for Greely erases the economic base of the town. A 50 year land withdrawal takes away potential resource development from area residents and offers nothing in return. 750 jobs existed at Fort Greely at the time that BRAC announced Fort Greely would be realigned. All but 50 - 60 of these jobs will be gone entirely by 2001. Renewal of the land withdrawal will not bring 700 jobs back. The LEIS would like to convince Delta residents that renewal of the withdrawal will have a very positive effect of the economy of the area by assuring the retention of 50 jobs. "There are approximately 50 to 60 Department of Defense jobs planned for Fort Greely after BRAC95. These positions are contingent upon withdrawal renewal. Thus, these positions would be eliminated without renewal and other area jobs would be lost in the trade and service sectors as a consequence." I do not believe that these 50 jobs that the Army may keep on post will do much to buoy the economy. Will those 50 jobs still be here 50 years from now? Increased military training and reduced land and air access may hinder local efforts to develop the tourism industry. Tourism is a resource that area residents have rallied behind as part of an effort to boost the economy. Note the recent formation of the Delta Visitors' and Convention Bureau, the continued support for the Festival of Lights winter carnival, the presence of new flight-seeing and wildlife viewing tour businesses. Even the LEIS admits that military use of the lands could inhibit the growth of the tourism industry. The land renewal offers no new jobs for Delta, restricts mineral exploration, may or may not be harming fishing resources, and does nothing to promote the tourism industry. At a time when Delta is struggling to maintain economic viability, I can find no socioeconomic advantage for supporting a 50 year land withdrawal.

□ I do believe in one overriding reason why anyone should support this land withdrawal, military training. Our armed forces must practice low elevation flying and dropping bombs, play war games, and test equipment. These activities are best conducted in rural areas far from population centers. Delta Junction is such a site. I am not opposed to the military. As a child I grew up next to the Naval Ordnance Laboratory (NOL) in Silver Spring, MD. The tradeoff for having nearby explosions rattle my window late at night was the large expanse of big oak trees that extended beyond my backyard which provided habitat for wildlife and protected the local watershed from the suburban sprawl that engulfed most of the nearby area. The presence of Fort Greely has been beneficial for Delta community. However, with the realignment of Fort Greely, little is being offered back to the community in return for putting up with the noise, air, and water pollution; limitations on the development of natural resources, the hindrances to tourism. The Army is asking us to condone all this for 50 years. Instead, I suggest a 15 year withdrawal renewal with some provisions guaranteeing fire management support, public access to most heavily used recreation trails, baseline and impact studies for wetlands and wild fish populations, local range control, military convoy considerations and safety precautions, and allowances for mining exploration. I hope to pass on to my grandchildren a Delta tradition of a positive relationship with the military.

□□□□□□□ Sincerely,

□□□

□□□□□□□ Judy G. Olson Hicks

SOC-DD015

SOC-DD015: The effects of the Base Realignment and Closure on the town of Delta Junction is not within the scope of this LEIS. See Chapter 1, *Purpose of and Need for Action*. 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.

ALT-DD061

ALT-DD061: Noted. Thank you for your comment.

EE

Name: Randy Bealer

Organization:

Address: P.O. Box 796

Delta Junction, AK 99737

Comment: □□□□□□Randy Bealer
□□□□□□P.O. Box 796
□□□□□□Delta Junction, Alaska 99737

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

I have three items I would like to comment on. First, I want to express my thanks for the canned, blanket, and generic responses to the specific concerns addressed in my two letters that appeared in the scoping summary section of the draft L.E.I.S. In general the referenced responses that were given did not apply at all to my concerns.

OTH-EE032

Secondly, in our local news, I have noticed that a barrage of high ranking military officials have been coming to Fairbanks to talk about the bright future of the military in Alaska. They indicate that this bright future will translate to an economic boom for interior Alaska. They do not foresee any military cutbacks but they expect military growth ("to take advantage of our perfect training areas"). None of them even mentioned the BRAC realignment of Fort Greely. It is obvious they are only here campaigning for the 50 year Army lands renewal. They termed "all Alaska" as being a wonderful battlefield training area for the military. I do not wish to live in a battlefield.

OTH-EE033

My last item of comment has to do with the socioeconomic section (3.19). I do not feel it was made clear enough in that section that Fort Greely is on the BRAC list and is scheduled to all but close. How about including some charts and graphs showing results of the BRAC impact on the local Delta economy. Why was Fort Greely lumped in with the Fairbanks economy? Fort Greely is 100 miles from Fairbanks. If the army does not want to maintain an economic presence in the Delta area then their physical battlefield presence will no longer be welcome. Give us back our land.

SOC-EE016

□□□□□□Sincerely,
□□□□□□Randy Bealer

RESPONSES TO COMMENT EE

OTH-EE032: The scoping process gathers concerns from the public to define significant issues and develop possible alternatives.

OTH-EE033: Noted. Thank you for your comments.

SOC-EE016: The Base Realignment and Closure (BRAC) 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.

GG
(FF was not used)

Name: Pamela K. Miller
Organization: Alaska Community Action on Toxics
Address: 135 Christensen Drive

Anchorage, AK 99501

Comment: Alaska Community Action on Toxics
135 Christensen Drive, Suite 100
Anchorage, Alaska 99501
(907) 222-7714 (phone); (907) 222-7715 (fax)

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

February 7, 1999

Comments on the Draft Legislative Environmental Impact Statement: Alaska Army Lands Withdrawal
Renewal—Transmitted Electronically Via Internet and Fax

Dear Ms. Herdrich:

I present my comments on behalf of Alaska Community Action on Toxics, a program of the Alaska Conservation Foundation. Alaska Community Action on Toxics is a non-profit organization that works to protect human health and the environment from the toxic effects of contaminants. We are dedicated to achieving environmental justice through our collaborative work with tribes and other affected communities. Similar comments as those that follow were also presented before the Defense Environmental Response Task Force (DERTF) at their public hearing in San Francisco on February 3, 1999.

Within Alaska, massive areas of land, including sensitive riparian and wetlands, have been used by the military as weapons testing ranges. According to a public affairs officer with the Air Force, these testing ranges encompass an area within Alaska equivalent to the size of the state of Kansas. The military has not been accountable for the untold past, present and future damage to lands, wildlife habitat, human health and safety. This must change. We now have some opportunities before us to reverse the Department of Defense's disturbing trend of destruction in Alaska.

The Department of the Army released a Draft Legislative Environmental Impact Statement (DLEIS) that proposes to continue use of 1,300 square miles of Interior Alaska lands as bombing ranges for another 50 years on Fort Wainwright and Fort Greely. In the last 5 years alone, the military has shot 3,500 rockets packed with high explosives, 4,300 bombs—some weighing up to a ton, and about 50,000 additional high explosives into the Chena River watershed. Similar quantities of bombs, rockets, and missiles have been shot onto the lands along the Delta River adjacent to Fort Greely. In addition, the area has been subjected to chemical agents including nerve gas VX and VG, mustard gas, and biological warfare agents.

The Army admits it has virtually no baseline of information on the ecological damage from the physical and toxicological effects of the explosive and chemical munitions testing. Our efforts to secure information through the Freedom of Information Act on the nature and extent of Army/Air Force weapons ranges and testing areas have been met with secrecy and lack of cooperation. The LEIS exhibits a poor understanding of the hydrology of the region and potential exposure pathways via ground- and surface waters. Bombing continues in sensitive riparian and other important habitats without regard for erosional impacts, contamination problems and transport pathways of contaminants. In light of recent studies at other military bases that demonstrate contamination of ground- and surface water with toxic and carcinogenic propellants and heavy metals, we demand completion of an

OTH-GG034

USE-GG040

POL-GG013

RESPONSES TO COMMENT GG

OTH-GG034: Noted. Thank you for your comments.

USE-GG040: Unfortunately, events that occurred in the past cannot be taken back or erased. However, these actions can be remediated.

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). Current decontamination efforts are described including an ordnance cleanup history by the Air Force (response to POL-A002 and Appendix 2.C).

POL-GG013: 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). Current decontamination efforts are described including an ordnance cleanup history by the Air Force (Appendix 2.C).

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. The goals of ITAM are to evaluate, repair, maintain, and enhance training lands at Army training installations. Please refer to Appendix 2.D for a detailed description of the ITAM program.

GG

Alaska Army Land Withdrawal Comment/Concerns Submittals

Monday, 8 February 1999

independent and complete characterization of potential exposure pathways including air, ground- and surface waters, fish and wildlife on- and off-site the ranges and testing areas. Ed Sheehan, a retired Lt. Colonel who had indirect control over bombing range activities at Fort Greely objected in the public meeting that the proposal would enlarge the impact areas beyond even the expansive former ranges. The LEIS failed to fully characterize the testing areas, quantities, impacts, and types of weapons to be tested over the next 50 years. The LEIS also failed to analyze impacts from previous weapons testing, including the potential use of depleted uranium weapons within the weapons ranges. "Green" or dummy munitions that do not present toxic or physical hazards must be considered as options if certain weapons testing areas remain open. These must also be recovered and impact damage repaired.

We urge that the Army not be granted any extension of the land withdrawal. The 50 year time period is excessive given that most land withdrawals are considered on a 10 to 15 year time period. The DoD must fully characterize and remediate the severely damaged lands and waters within the weapons ranges proposed for continued withdrawal. The LEIS must consider that military munitions spent or deposited on or off firing ranges are classified as hazardous waste under the Resource Conservation and Recovery Act (RCRA). The Federal Facilities Compliance Act requires that the Army comply with environmental laws just as businesses are required. "Conventional" munitions are a threat to public health and safety, the environment, subsistence use, recreational and other uses. The testing and disposal of munitions exposes wildlife and humans to explosive and toxic hazards. These exposures and further erosional and other physical damage must be avoided by remediating and restoring lands damaged by munitions testing.

Sincerely,

Pamela K. Miller
Program Director

Cc ☐ Senator Ted Stevens
☐ Senator Frank Murkowski
☐ Representative Don Young
☐ Governor Tony Knowles
☐ AK Department of Environmental Conservation Commissioner Michelle Brown
☐ Secretary of Interior Bruce Babbitt
☐ Department of Interior Special Assistant for Alaska, Marilyn Heiman

USE-GG041

USE-GG041: The primary type of training munition expended by the Air Force on the withdrawal lands is the BDU-33, which is a "dummy" bomb. The Army has completed initial testing of 5.56mm "green" (non-lead) bullets. Development plans continue for lead-free 9mm and 50cal ammunition.

ALT-GG063

Chapter 2.1.3.5 describes Air Force decontamination efforts on the withdrawal lands. Chapter 4.23 describes proposed decontamination mitigation by the Army on its Ranges and Impact Areas.

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

MIT-GG017

ALT-GG063: Noted.

MIT-GG017: 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). Current decontamination efforts are described including an ordnance cleanup history by the Air Force (Appendix 2.C).

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. The goals of ITAM are to evaluate, repair, maintain, and enhance training lands at Army training installations. Please refer to Appendix 2.D for a detailed description of the ITAM program.

9-110



HH
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

FEB 5 1999

Reply To
Attn Of: ECO-088

Ref: 98-063-DOA

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

Dear Ms. Herdrich:

The Environmental Protection Agency (EPA) has completed its review of the Draft Legislative Environmental Impact Statement (DLEIS) for the proposed **Alaska Army Lands Withdrawal Renewal** in accordance with its authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The DLEIS has been prepared by the Department of the Army in response to the Military lands Withdrawal Act and evaluates the continuing military need for lands withdrawn from public use at Fort Greely and Fort Wainwright Yukon Training Area in Alaska. The DLEIS evaluates two alternatives and identifies continued renewal of the withdrawn lands for 50 years as the Army's preferred alternative.

Based on our review and evaluation of the DLEIS, we have assigned a rating of EO-2 (Environmental Objections -Insufficient Information) to the draft EIS. This rating, and a summary of our comments, will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Our objections are based primarily on the evaluation of a restricted range of alternatives, and potentially significant direct, indirect, and cumulative environmental impacts associated with current and proposed activities on the lands proposed for renewed withdrawal. We believe that the EIS needs a significant amount of additional information in order for it to meet its fundamental role as a disclosure document. A significant amount of information defining the current environmental conditions on both facilities is needed to define the affected environment and evaluate future cumulative effects. We also believe that more site-specific evaluation of impacts from military activities on the withdrawn lands is needed to clearly define the consequences of renewed withdrawal and allow for the identification of options for minimizing or avoiding impacts, per NEPA (40 CFR 1500.2(f)). We also recommend that the cumulative impacts analyses be expanded and suggest the Council on Environmental Quality's handbook on cumulative effects analysis be consulted.

These issues, along with others that we believe need to be addressed in the EIS, are

discussed in greater detail in the enclosure to this letter.

Thank you for the opportunity to provide comments on the DLEIS. I urge you to contact Bill Ryan of my staff at (206) 553-8561 at your earliest opportunity to discuss our comments and how they might best be addressed for the project.

Sincerely,

Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosure

cc: Lieutenant Colonel Mark C. Nelson, USARAK

HH

EPA Region 10 Comments on the Draft Legislative Environmental Impact Statement for the Alaska Army Lands Withdrawal Renewal

Range of Alternatives

We are very concerned with the extremely limited range of alternatives considered and evaluated in the Draft Legislative Environmental Impact Statement (DLEIS). As currently written, the EIS evaluates a single action alternative (a proposed 50 year withdrawal period) and the No Action alternative (no withdrawal beyond 2001). Given that the No Action alternative must be included for analysis by the implementing regulations for the National Environmental Policy Act (NEPA) and the additional 50-year withdrawal represents the Army's proposed action, we are concerned that the EIS has not presented the public or the decision makers with an evaluation of a range of reasonable alternatives which provide a clear basis for choice, as required by NEPA itself (see Section 102 of NEPA) and its implementing regulations (40 CFR 1502.14). Pages ES-6 and 2-32 of the DLEIS indicate that alternatives consisting of various lengths of renewal periods were not considered in detail because they "would offer little effective impact analysis" and that the "scope of actions" and "management and use of these withdrawal lands" would remain the same under each time period. While we do not dispute the claim that the scope of actions and management and use would remain the same for each time period, we believe that these actions and uses are likely to result in differing levels of environmental effects. Impacts to the environment from continued military activities over a 50 year period are very likely to be different from those that would result from the same activities conducted over a 10, 20, or 100 year period. The EIS is the vehicle to evaluate and disclose these differences so as to provide the public and the decision makers (in this case, Congress) an understanding of reasonable alternatives to the presently proposed 50 year withdrawal renewal. We recommend that the Army seriously evaluate additional renewal periods along with the proposed action and the No Action alternative, consistent with NEPA. Such alternatives do not appear to pose discernible conflicts with the ability of the Army to achieve its operational and training objectives in Alaska.

Environmental Effects

Current and proposed future activities on the Fort Wainwright Yukon Training Area and Fort Greely have the potential to cause significant environmental impacts. Off-road maneuvering and activities can result in severe damage to soils and vegetation and contribute to water quality degradation through increased input of sediments. The use of munitions also damage soils and vegetation, as well as lead to potentially significant contamination of soils, surface waters, and/or ground water. Spilled fuels and lubricants could result in potentially significant soil, surface water, and/or groundwater contamination. We believe that the DLEIS should provide sufficient information and analyses to allow the public and the decision makers to understand 1) whether the

RESPONSES TO COMMENT HH

ALT-HH064

ALT-HH064: The Council on Environmental Quality implementation guidelines for NEPA does not specify a required number of alternatives to satisfy a range. Chapter 2.3 identifies those alternatives considered but eliminated from further analysis, with the reasons for their elimination.

POL-HH014

POL-HH014: The DLEIS cannot supply information and analyses if the studies have not been conducted, and data are not available. Mitigation for the withdrawal renewal identifies the lack of information and the necessity to conduct studies in order to determine effects of military activities on the environment. Please refer to Chapter 4.23 for Existing and Proposed Mitigation.

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withdrawn lands have been significantly impacted by past and current activities, and 2) whether the renewal of the withdrawn lands would result in potentially significant impacts, when considered cumulatively with current conditions. We do not believe that the DLEIS provides this type of information. Comments related to the characterization of current and future impacts are presented below.

Affected Environment/Baseline Information

The meaningful assessment of environmental impacts from proposed activities in an EIS requires a good characterization of current (baseline) conditions and a reasonable projection of future direct, indirect and/or cumulative impacts (see 40 CFR 1502.16). We find it extremely difficult to determine the potential impacts of the preferred alternative due, in large part, to the lack of baseline environmental information. Chapter 4 of the DLEIS indicates that a large amount of baseline information is not available, has not been collected, or does not exist. We believe that this lack of information results in incomplete characterizations of impacts and is inconsistent with one of the main purposes of NEPA; to “insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken” (see 40 CFR 1500.2(b)). To ensure that the EIS contains sufficient information to allow reviewers and Congress to understand the implications of selecting the proposed action in the context of the impacts from past and ongoing activities, we recommend that the EIS be revised to include the following information:

- Data on damage to soils from military activities
- Data on damage to soils, vegetation, and water quality caused by munitions
- Contamination studies of the Impact Areas
- Contamination studies assessing impacts of TNT and RDX
- Baseline munitions study for Fort Wainwright
- Data on damage from BDU-33
- Comprehensive fuel spill information
- Vegetation loss from military activities
- Total wetland impacts from military activities
- Disturbance of wildlife species by military activities
- Impacts to wild fish populations from military activities
- Violations of applicable Alaska State Water Quality Standards

Direct Impacts of the Proposed Action

The DLEIS provides generalized descriptions of potential impacts associated with activities that would take place under the proposed action. We were unable, in most cases, to find a translation of those descriptions to meaningful, site-specific characterizations of impacts associated with the proposed action. As an example, Section 4.10 presents a good general discussion of activities that would result in impacts to wetlands and the associated environmental consequences of those impacts. The EIS, however, fails to discuss the projected levels of those impacting activities, the spatial distribution of such activities, and projected amount of wetlands (and associated functions) that would be lost with the implementation of the proposed action. We

POL-HH015

POL-HH015: The DLEIS cannot be revised to include data which has not been collected by either the Army or other agencies. Although the Army does not have the data, the Army never the less believes that adequate data have been evaluated to support the implementation of the proposed action through the preferred alternative. Please refer to Chapter 4.23, Proposed Mitigation.

OTH-HH035

OTH-HH035: The DLEIS cannot supply information and analyses if the studies have not been conducted, and data are not available. No baseline studies to assess the effects of munitions on soils, surface water, groundwater, wetlands, vegetation, or wildlife have been completed for the withdrawal lands or surrounding areas by the military or State and Federal agencies. Where data was available, site specific references are included throughout the LEIS. 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).

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recommend that the EIS be revised to include information that translates the general descriptions of activities and impacts of the proposed action to impact characterizations that allow the public and the decision makers an understanding of the site-specific consequences of implementing the proposed action.

We believe that the collection and analysis of baseline information identified above would aid in the evaluation of projected direct impacts from the proposed action. By evaluating current environmental conditions along with historical activities on the withdrawn lands, relationships/correlations could be developed as a means of projecting potential impacts from future activities. We recommend that this approach be explored in the further development of the EIS.

Cumulative Effects

We are concerned with the rather cursory treatment of cumulative effects in the DLEIS. The NEPA regulations define a cumulative impact as the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” (40 CFR 1508.7). A meaningful cumulative impact analysis cannot be developed without information about past, present and reasonably foreseeable actions (and their associated impacts). We recommend that information related to current environmental conditions (reflecting past and current activities), along with site-specific characterizations of impacts from the proposed action, be developed in order ensure that meaningful cumulative effects analyses can be completed and presented in the EIS. We also recommend that the Army consult *Considering Cumulative Effects under the National Environmental Policy Act* developed by the Council on Environmental Quality (CEQ), as it provides a good framework for developing cumulative effects analyses in the context of NEPA. This publication can be downloaded from the CEQ’s web site, and is located at <http://ceq.eh.doe.gov/nepa/nepanet.htm>.

Mitigation Measures

The DLEIS identifies the USARAK Range Regulation 350-2 and the Integrated Training Area Management (ITAM) program as currently being used to mitigate environmental impacts on the lands proposed to be withdrawn for the next 50 years. While the EIS presents general descriptions of Regulation 350-2 and the ITAM program, it does not indicate the degree to which they have been complied with/implemented, or the effectiveness of their implementation in achieving necessary environmental protection goals. We believe that it is critically important that the EIS disclose to the public and the decision makers the effectiveness of the current approaches being taken to mitigate environmental impacts, particularly since the very same measures are being proposed for continued use should the proposed renewal be selected. Because Congress will determine the mitigation measures to be applied with renewal of the withdrawn lands, we believe that they must clearly understand the effectiveness of the current approach before they can determine whether continued use of Regulation 350-2 and ITAM provide an effective means of

OTH-HH036: This LEIS was prepared in accordance with NEPA, CEQ Regulations, and Army Regulations. Cumulative impacts are described throughout Chapter 4.

MIT-HH018: 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.

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.

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. The goals of ITAM are to evaluate, repair, maintain, and enhance training lands at Army training installations. Please refer to Appendix 2.D for a detailed description of the ITAM program.

Please refer to Chapter 4.23 *Proposed Mitigation*.

OTH-HH036

MIT-HH018

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the achieving necessary levels of environmental protection. Consequently, we recommend that the EIS be revised to include 1) a more thorough description of Regulation 350-2 and the ITAM program (and any other relevant regulations or programs), 2) information related to the level of implementation of the regulation and ITAM (is there 100 percent compliance/implementation, or some lower rate?), and 3) a discussion of the effectiveness of these approaches in mitigating environmental impacts.

The DLEIS identifies numerous information/data gathering efforts as mitigation measures. The information that is identified as being needed appears to be, for the most part, baseline information required to define current conditions on both Fort Greely and Fort Wainwright and should be integrated into analyses of impacts of the proposed action. We recommend that this information be collected and incorporated into the EIS. We also recommend that mitigation measures presented in the EIS be consistent with the definition of mitigation presented in the NEPA regulations (40 CFR 1508.20).

Evaluation of Significant Issues

Page 1-9 of the DLEIS identifies Submerged Lands as a significant issue raised during the scoping process and indicates that it, along with other significant issues, are analyzed in the EIS. In reviewing the DLEIS, we found very little discussion, and virtually no analysis, of this issue. We suggest that this issue be analyzed and discussed in the evaluation of the proposed action, as it has implications on potential future uses of the lands proposed for renewal. We recommend that the DLEIS evaluate the potential consequences of the State of Alaska's claim to the submerged lands in question being valid in combination with the renewal of the withdrawn lands to ensure that significant issues have been analyzed in the EIS.

MIT-HH019

MIT-HH019: 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).

LAND-HH014

LAND-HH014: 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 describe the issue of water quality, monitoring, and decontamination of submerged lands.

HH

SUMMARY OF THE EPA RATING SYSTEM
FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS:
DEFINITIONS AND FOLLOW-UP ACTION *

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment



Fairbanks Area Alaska State Parks Citizen Advisory Board

3700 Airport Way Fairbanks, Alaska 99709-4613 (907) 451-2695

II

February 2, 1999

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

Dear Ms. Herdrich:

Subject: Military Land Withdrawals

I am most concerned about the military seeking a 50-year extension of land withdrawals which cover 871,537 acres of Interior Alaska. This is three times longer than the current withdrawal terms. There are three withdrawals involved: Fort Wainwright Yukon Training Area, which covers 247,952 acres east of Eielson Air Force Base in the uplands between the Chena and Salcha rivers; and the Fort Greely East and West training areas that straddle the Richardson Highway in the Donnelly Dome area south of Fort Greely, and together cover another 623,585 acres. Congress last renewed the military use of the Interior blocks in 1986, granting U.S. Army Alaska 15 more years of possession but tying any future extension to completion of an environmental impact statement.

The land grant expires November 6th, 2001, and the citizens of Northern Interior Alaska want the land back! There are a lot of potential public concerns about the continuing withdrawals that the Army and Air Force hope do not come up. The state has requested acreage bordering the Chena River State Recreation Area to expand access to timber, mineral, hunting and fishing resources, and additional wildlife protection measures.

Now much of the land is covered with hazardous material and "unspent ordnance." These unexploded live ordnance and munitions residue ("duds," "warheads," the *Fairbanks Daily News Miner* Fred Pratt article calls them), have polluted and contaminated our land and wildlife, and environmental hazards have emerged, such as the old shells and other munitions that lurk under the surface of the Delta River and other glacial-fed waterways within Fort Greely's old bombing range.

The Stuart Creek area is also cluttered with other contaminants. For example, old cars, oil drums, motors, and transmissions, and other so called "targets" that sink into the mud during "Break Up" each year where the oil floats to the surface, then the target area turns into a huge mud hole 5' to 6' deep with oil floating on top. This lingering problem leads to potential threats to local wildlife populations. The military has not been good stewards of their land occupation during the previous tenancy because their "dud" picking-up business has faltered and they do not demonstrate that they are meeting environmental impact requirements for clean up and probably will not until they are legally required to do so at the time of withdrawal.

RESPONSES TO COMMENT II

ALT-II065: 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.

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 dated February 4, 1999 received during the comment period on this LEIS.

POL-II016: Please refer to response POL-A002. Current decontamination efforts are described including an ordnance cleanup history by the Air Force (Appendix 2.C).

USE-II042: Since the early 1970's, all vehicles placed within Impact Areas to be used as targets have been purged of all oils, antifreeze, lubricants, batteries and other fluids. Also, all glass has been removed to prevent despecularization (reflection of laser light) (Reidsma, pers. com. 1999).

ALT-II065

The Air Force's decontamination efforts conducted at Stuart Creek and Oklahoma/Delta Creek Impact Areas are discussed in Chapter 2.1.3.5. Targetry used at these areas are also cleared on an "as needed" basis which includes scrap metal, target practice bombs, and other debris.

POL-II016

Impacts to wildlife are discussed in Chapter 4.12. Proposed mitigation listed in 4.23 *Pollution*, would address this concern.

USE-II042

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. The goals of ITAM are to evaluate, repair, maintain, and enhance training lands at Army training installations. Please refer to Appendix 2.D for a detailed description of the ITAM program.

USE-II043

USE-II043: Decontamination efforts conducted by the military are described in Chapter 2.1.3.5. An ordnance cleanup history by the Air Force is also included in Appendix 2.C.

In 1975, the Alaska State Legislature designated the boundaries of the Chena River State Recreation Area, including a portion of military land that the state placed as one of its highest priorities for topfiling, should the military relinquish the land. Some of that military land was relinquished in the early 1990's, but not all of it. The Beaver Creek drainage is the southern-most creek in the State Park Recreation Area, still under federal ownership and designated as PTTA (Prohibited Tactical Training Area) by the military.

Why would anyone go into the Beaver Creek drainage? It is the only cross-country link between the eastern side and the western side of the recreation area south of the Chena Hot Springs Road. Trail users, hunters, trappers and other adventure-seekers travelling the Chena River's South Fork or East Fork Rivers logically want to continue their travel and return in a large loop, rather than retracing their steps. More than 20 years ago, the Alaska Legislature envisioned, and we continue to want to include, the Beaver Creek drainage as a functional part of the Chena River Recreation Area. The 13,440 acre slice of the Yukon Maneuver Area's buffer zone should be available to continue safe and hazard-free access for all park user groups.

The "draft" Environmental Impact Statement says the Beaver Creek drainage is very essential to the military's training mission. Even if this is assumed as true, who can say how long it will remain true? No one can predict a 50-year need for these lands with any certainty. With the Base Realignment Closure of Fort Greely, Alaska within the next few years WHY does the military ask for a 50 year extension of this land withdrawal? Most of us and most of our children will not see its use again for public access, if this requested extension is approved. There should be frequent reviews of the military land needs. When withdrawal of land can no longer be justified, it should be returned to the owners.

Another issue is that the military says these areas are environmentally safe. Then, why can we not obtain permits for access to the buffer area (PTTA) when not in use for training. Why is it closed for public recreation use? For some military land, they allow hunters or trappers to get a permit from the MPs (and be presented a safety briefing and provided a map layout of the area, at the same time, if required) before entering the land. Why is this buffer land (Beaver Creek drainage) not treated the same way for users? After all, the military controlled land within the Chena River State Recreation Area boundaries is not the bombing range -- it is a buffer area, presumably safe to use when military exercises are not being conducted. And why is there only a permit for consumptive uses (hunting, fishing, and trapping) and not for general recreation? The land could be well signed so no one would knowingly wander astray of the boundaries, and opened between training maneuvers for casual users, such as cross-country travelers (dog mushers, snow machiners, etc.), especially those who access the land from the state park rather than using the military roads. Can we set up a cooperative agreement to allow this?

Our Senior Ranger asks: "Did you read that new Recreational Access Act? Did it say that the public needs a *permit* to access anything other than sensitive or dangerous areas? Is the PTTA (Beaver Creek) dangerous all the time, or only during air operations? Isn't the area now open to unpermitted access?" He further states, "It's not up to us to monitor or control public access to military lands. If we publish a new flyer, we can indicate the "closed" impact area, and give the MP phone number for info."

ACC-II023

ACC-II023: 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.

ALT-II066

ALT-II066: 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. 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 review process.

The Army allows public access to its lands when areas are not being used for training and when there is no danger to public safety (see Chapters 3.16 and 4.16 for access requirements to the withdrawal renewal lands).

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-II024

ACC-II024: 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.

ACC-II025

ACC-II025: The Sikes Act (16 USC 670a et seq.) is not a recreational access act. The Army's Natural Resources office is working with the Alaska Division of Parks to identify the trail route currently being used by the public within the Beaver Creek-South Fork drainage area.

9-118

Jefferies to Herdrich
February 3, 1999
Page 3

Our recommendations are:

- a. make the withdrawal a 10 year maximum term, OR disapprove any/all extensions, and return this military occupied land back to the State after appropriate clean-up,
- b. if the withdrawal is continued, move the buffer area of Stuart Creek to allow access to the Beaver Creek drainage in the Chena River State Recreation Area land
- c. verify access restrictions/requirements for the public to the PTTA (Beaver Creek) and the Impact Area and make that information widely dispersed/available,
- d. cooperatively work to find a suitable trail route in the Beaver Creek to connect to the East Fork valley,
- e. work on a cooperative management agreement for that trail, and
- f. let the Military and the State patrol and manage their own respective lands

Sincerely yours,



Jack L. Jefferies
Chairman
Fairbanks Area Alaska State Parks
Citizen Advisory Board

Enclosures (4) Fred Pratt article
Dan O'Neill article
Brian O'Donoghue, Staff Writer, Fairbanks News-Miner Newspaper
New Recreational Access Act

Public Law 99-561
99th Congress

An Act

To enhance the carrying out of fish and wildlife conservation and natural resource management programs on military reservations, and for other purposes.

Oct. 27, 1986
[S. 1352]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. AUTHORIZATION OF APPROPRIATIONS.—(a) Subsections (b) and (c) of section 106 of the Sikes Act (16 U.S.C. 670f (b) and (c)) are each amended by striking out “and 1985,” and inserting in lieu thereof “1985, 1986, 1987, and 1988,”.

(b) Subsections (a) and (b) of section 209 of the Sikes Act (16 U.S.C. 670c (a) and (b)) are each amended by striking out “and 1985,” and inserting in lieu thereof “1985, 1986, 1987, and 1988,”.

16 USC 670c.

SEC. 2. NATURAL RESOURCES AND FISH AND WILDLIFE MANAGEMENT ON MILITARY RESERVATIONS; REPORT ON MILITARY EXPENDITURES FOR FISH AND WILDLIFE MANAGEMENT.

16 USC 670a-1.

(a) NATURAL RESOURCES MANAGEMENT.—The Secretary of each military department shall manage the natural resources of each military reservation within the United States that is under the jurisdiction of the Secretary—

(1) so as to provide for sustained multipurpose uses of those resources; and

(2) to provide the public access that is necessary or appropriate for those uses;

to the extent that those uses and that access are not inconsistent with the military mission of the reservation.

(b) FISH AND WILDLIFE MANAGEMENT SERVICES.—The Secretary of each military department shall ensure, to the extent feasible, that the services necessary for the development, implementation, and enforcement of fish and wildlife management on each military reservation within the United States under the jurisdiction of the Secretary are provided by the Department of Defense personnel who have professional training in those services.

(c) FISH AND WILDLIFE MANAGEMENT REPORT.—The Secretary of each military department shall submit to each House of the Congress, before the close of the 180-day period occurring after the close of fiscal year 1986, a detailed report setting forth the amount and purpose of all expenditures made during fiscal year 1986 for fish and wildlife management on each military reservation in the United States under the jurisdiction of the Secretary.

(d) DEFINITIONS.—As used in this section—

(1) The term “military department” means the Department of the Army, the Department of the Navy, and the Department of the Air Force.

(2) The term “United States” means the States, the District of Columbia, the Commonwealth of Puerto Rico, and the territories and possessions of the United States.

II

SEC. 3. SIKES ACT AMENDMENTS.

(a) COOPERATIVE PLANS.—(1) Section 101 of the Act of September 15, 1960 (commonly referred to as the “Sikes Act”; 16 U.S.C. 670a) is amended to read as follows:

State and local governments.

“SEC. 101. (a) The Secretary of Defense is authorized to carry out a program of planning for, and the development, maintenance, and coordination of, wildlife, fish, and game conservation and rehabilitation in each military reservation in accordance with a cooperative plan mutually agreed upon by the Secretary of Defense, the Secretary of the Interior, and the appropriate State agency designated by the State in which the reservation is located.

“(b) Each cooperative plan entered into under subsection (a)—

“(1) shall provide for—

“(A) fish and wildlife habitat improvements or modifications,

“(B) range rehabilitation where necessary for support of wildlife,

“(C) control of off-road vehicle traffic, and

“(D) specific habitat improvement projects and related activities and adequate protection for species of fish, wildlife, and plants considered threatened or endangered;

“(2) must be reviewed as to operation and effect by the parties thereto on a regular basis, but not less often than every 5 years;

“(3) shall, if a multiuse natural resources management plan is applicable to the military reservation, be treated as the exclusive component of that management plan with respect to wildlife, fish, and game conservation and rehabilitation; and

“(4) may stipulate the issuance of special State hunting and fishing permits to individuals and require payment of nominal fees therefor, which fees shall be utilized for the protection, conservation, and management of fish and wildlife, including habitat improvement and related activities in accordance with the cooperative plan; except that—

“(A) the Commanding Officer of the reservation or persons designated by that Officer are authorized to enforce such special hunting and fishing permits and to collect the fees therefor, acting as agent or agents for the State if the cooperative plan so provides, and

“(B) the fees collected under this paragraph may not be expended with respect to other than the military reservation on which collected.

“(c) After a cooperative plan is agreed to under subsection (a)—

“(1) no sale of land, or forest products from land, that is within a military reservation covered by that plan may be made under section 2665 (a) or (b) of title 10, United States Code; and

“(2) no leasing of land that is within the reservation may be made under section 2667 of such title 10;

unless the effects of that sale or leasing are compatible with the purposes of the plan.

“(d) With regard to the implementation and enforcement of cooperative plans agreed to under subsection (a)—

“(1) neither Office of Management and Budget Circular A-76 nor any successor circular thereto applies to the procurement of services that are necessary for that implementation and enforcement; and

PUBLIC LAW 99-561—OCT. 27, 1986

100 STAT. 3151

"(2) priority shall be given to the entering into of contracts for the procurement of such implementation and enforcement services with Federal and State agencies having responsibility for the conservation or management of fish or wildlife.

Contracts.

"(e) Cooperative plans agreed to under the authority of this section and section 102 shall not be deemed to be, nor treated as, cooperative agreements to which the Federal Grant and Cooperative Agreement Act of 1977 (41 U.S.C. 501 et seq.) applies."

16 USC 670b.

(2) Subsection (d)(1) of such section 101 (as added by paragraph (1)) shall not affect any contract entered into before the date of the enactment of this Act for the provision of services to implement or enforce a cooperative plan under this Act on any military installation; but shall apply to the renewal, after such date of enactment, of any such contract.

Contracts.
16 USC 670a
note.

(b) FUNDS COLLECTED UNDER PLANS.—Subsection (a) of section 106 of the Sikes Act (16 U.S.C. 670f(a)) is amended by adding at the end thereof the following new sentence: "All funds that are so collected shall remain available until expended."

SEC. 4. FOREST PRODUCTS ON MILITARY RESERVATIONS.

Section 2665 of title 10, United States Code, is amended as follows:

(1) Subsection (d) is amended—

(A) by striking out "available for operation and maintenance during a fiscal year";

(B) by striking out "expenses" and inserting in lieu thereof "costs"; and

(C) by striking out "during such fiscal year".

(2) Subsection (e)(1) is amended by striking out "for all expenses of production of forest products".

(3) Subsection (f) is amended—

(A) by striking out "expenses" in the matter preceding subparagraph (A) in paragraph (1) and inserting in lieu thereof "costs";

(B) by amending paragraph (1)(C) to read as follows:

"(C) for natural resources management that implements approved plans and agreements.", and

(C) by amending paragraphs (2) and (3) to read as follows:

"(2) There shall be deposited into the reserve account the total amount received by the United States as proceeds from the sale of forest products sold under subsections (a) and (b) less—

"(A) reimbursements of appropriations made under subsection (d), and

"(B) payments made to States under subsection (e).

100 STAT. 3152

PUBLIC LAW 99-561—OCT. 27, 1986

"(3) The reserve account may not exceed \$4,000,000 on December 31 of any calendar year. Unobligated balances exceeding \$4,000,000 on that date shall be deposited into the United States Treasury."

Approved October 27, 1986.

LEGISLATIVE HISTORY—S. 1352 (H.R. 1202):

HOUSE REPORTS: No. 99-129, Pt. 1 (Comm. on Merchant Marine and Fisheries) and Pt. 2 (Comm. on Armed Services), both accompanying H.R. 1202.

CONGRESSIONAL RECORD:

Vol. 131 (1985): July 29, H.R. 1202 considered and passed House.

Vol. 132 (1986): Oct. 3, S. 1352 considered and passed Senate.

Oct. 14, considered and passed House.

Public Law 99-561
99th Congress

An Act

To enhance the carrying out of fish and wildlife conservation and natural resource management programs on military reservations, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. AUTHORIZATION OF APPROPRIATIONS.—(a) Subsections (b) and (c) of section 106 of the Sikes Act (16 U.S.C. 670f (b) and (c)) are each amended by striking out “and 1985,” and inserting in lieu thereof “1985, 1986, 1987, and 1988.”

(b) Subsections (a) and (b) of section 209 of the Sikes Act (16 U.S.C. 670c (a) and (b)) are each amended by striking out “and 1985,” and inserting in lieu thereof “1985, 1986, 1987, and 1988.”

SEC. 2. NATURAL RESOURCES AND FISH AND WILDLIFE MANAGEMENT ON MILITARY RESERVATIONS; REPORT ON MILITARY EXPENDITURES FOR FISH AND WILDLIFE MANAGEMENT.

(a) NATURAL RESOURCES MANAGEMENT.—The Secretary of each military department shall manage the natural resources of each military reservation within the United States that is under the jurisdiction of the Secretary—

(1) so as to provide for sustained multipurpose uses of those resources; and

(2) to provide the public access that is necessary or appropriate for those uses;

to the extent that those uses and that access are not inconsistent with the military mission of the reservation.

(b) FISH AND WILDLIFE MANAGEMENT SERVICES.—The Secretary of each military department shall ensure, to the extent feasible, that the services necessary for the development, implementation, and enforcement of fish and wildlife management on each military reservation within the United States under the jurisdiction of the Secretary are provided by the Department of Defense personnel who have professional training in those services.

(c) FISH AND WILDLIFE MANAGEMENT REPORT.—The Secretary of each military department shall submit to each House of the Congress, before the close of the 180-day period occurring after the close of fiscal year 1986, a detailed report setting forth the amount and purpose of all expenditures made during fiscal year 1986 for fish and wildlife management on each military reservation in the United States under the jurisdiction of the Secretary.

(d) DEFINITIONS.—As used in this section—

(1) The term “military department” means the Department of the Army, the Department of the Navy, and the Department of the Air Force.

(2) The term “United States” means the States, the District of Columbia, the Commonwealth of Puerto Rico, and the territories and possessions of the United States.

Oct. 27, 1986
[S. 1352]

16 USC 670c.

16 USC 670a-1.

II

100 STAT. 3150

PUBLIC LAW 99-561—OCT. 27, 1986

SEC. 3. SIKES ACT AMENDMENTS.

(a) COOPERATIVE PLANS.—(1) Section 101 of the Act of September 15, 1960 (commonly referred to as the “Sikes Act”; 16 U.S.C. 670a) is amended to read as follows:

“SEC. 101. (a) The Secretary of Defense is authorized to carry out a program of planning for, and the development, maintenance, and coordination of, wildlife, fish, and game conservation and rehabilitation in each military reservation in accordance with a cooperative plan mutually agreed upon by the Secretary of Defense, the Secretary of the Interior, and the appropriate State agency designated by the State in which the reservation is located.

“(b) Each cooperative plan entered into under subsection (a)—
“(1) shall provide for—

“(A) fish and wildlife habitat improvements or modifications,

“(B) range rehabilitation where necessary for support of wildlife,

“(C) control of off-road vehicle traffic, and

“(D) specific habitat improvement projects and related activities and adequate protection for species of fish, wildlife, and plants considered threatened or endangered;

“(2) must be reviewed as to operation and effect by the parties thereto on a regular basis, but not less often than every 5 years;

“(3) shall, if a multiuse natural resources management plan is applicable to the military reservation, be treated as the exclusive component of that management plan with respect to wildlife, fish, and game conservation and rehabilitation; and

“(4) may stipulate the issuance of special State hunting and fishing permits to individuals and require payment of nominal fees therefor, which fees shall be utilized for the protection, conservation, and management of fish and wildlife, including habitat improvement and related activities in accordance with the cooperative plan; except that—

“(A) the Commanding Officer of the reservation or persons designated by that Officer are authorized to enforce such special hunting and fishing permits and to collect the fees therefor, acting as agent or agents for the State if the cooperative plan so provides, and

“(B) the fees collected under this paragraph may not be expended with respect to other than the military reservation on which collected.

“(c) After a cooperative plan is agreed to under subsection (a)—

“(1) no sale of land, or forest products from land, that is within a military reservation covered by that plan may be made under section 2665 (a) or (b) of title 10, United States Code; and

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unless the effects of that sale or leasing are compatible with the purposes of the plan.

“(d) With regard to the implementation and enforcement of cooperative plans agreed to under subsection (a)—

“(1) neither Office of Management and Budget Circular A-76 nor any successor circular thereto applies to the procurement of services that are necessary for that implementation and enforcement; and

State and local governments.

“(2) priority shall be given to the entering into of contracts for the procurement of such implementation and enforcement services with Federal and State agencies having responsibility for the conservation or management of fish or wildlife.

Contracts.

“(e) Cooperative plans agreed to under the authority of this section and section 102 shall not be deemed to be, nor treated as, cooperative agreements to which the Federal Grant and Cooperative Agreement Act of 1977 (41 U.S.C. 501 et seq.) applies.”

16 USC 570b.

(2) Subsection (d)(1) of such section 101 (as added by paragraph (1)) shall not affect any contract entered into before the date of the enactment of this Act for the provision of services to implement or enforce a cooperative plan under this Act on any military installation; but shall apply to the renewal, after such date of enactment, of any such contract.

Contracts.
16 USC 570a
note.

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(C) by striking out “during such fiscal year”.

(2) Subsection (e)(1) is amended by striking out “for all expenses of production of forest products”.

(3) Subsection (f) is amended—

(A) by striking out “expenses” in the matter preceding subparagraph (A) in paragraph (1) and inserting in lieu thereof “costs”;

(B) by amending paragraph (1)(C) to read as follows: “(C) for natural resources management that implements approved plans and agreements.”; and

(C) by amending paragraphs (2) and (3) to read as follows:

“(2) There shall be deposited into the reserve account the total amount received by the United States as proceeds from the sale of forest products sold under subsections (a) and (b) less—

“(A) reimbursements of appropriations made under subsection (d), and

“(B) payments made to States under subsection (e).

“(3) The reserve account may not exceed \$4,000,000 on December 31 of any calendar year. Unobligated balances exceeding \$4,000,000 on that date shall be deposited into the United States Treasury.”

Approved October 27, 1986.

LEGISLATIVE HISTORY—S. 1352 (H.R. 1202):

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CONGRESSIONAL RECORD:

Vol. 131 (1985): July 29, H.R. 1202 considered and passed House.

Vol. 132 (1986): Oct. 3, S. 1352 considered and passed Senate.

Oct. 14, considered and passed House.

one or more military departments or Defense Agencies, the Secretary of Defense shall provide for the installation of fiber-optics based telecommunications technology to link as many of the installations in the area as practicable in a telecommunications network. The Secretary shall use a full and open competitive process, consistent with section 2304 of title 10, United States Code, to provide for the installation of the telecommunications network through one or more new contracts.

(b) **FEATURES OF NETWORK.**—The telecommunications network shall provide direct access to local and long distance telephone carriers, allow for transmission of both classified and unclassified information, and take advantage of the various capabilities of fiber-optics based telecommunications technology.

(c) **TIME FOR REQUEST FOR BIDS OR PROPOSALS.**—Not later than March 30, 1998, the Secretary of Defense shall release a final request for bids or proposals to provide the telecommunications network or networks described in subsection (a).

(d) **REPORT ON IMPLEMENTATION.**—Not later than December 31, 1998, the Secretary of Defense shall submit to the congressional defense committees a report on the implementation of subsection (c), including the metropolitan area or areas selected for the installation of a fiber-optics based telecommunications network, the current telecommunication costs for the Department of Defense in the selected area or areas, the estimated cost of the fiber-optics based network, and potential areas for the future use of fiber-optics based networks.

TITLE XXIX—SIKES ACT IMPROVEMENT

- Sec. 2901. Short title.
- Sec. 2902. Definition of Sikes Act for purposes of amendments.
- Sec. 2903. Codification of short title of Act.
- Sec. 2904. Preparation of integrated natural resources management plans.
- Sec. 2905. Review for preparation of integrated natural resources management plans.
- Sec. 2906. Transfer of wildlife conservation fees from closed military installations.
- Sec. 2907. Annual reviews and reports.
- Sec. 2908. Cooperative agreements.
- Sec. 2909. Federal enforcement.
- Sec. 2910. Natural resources management services.
- Sec. 2911. Definitions.
- Sec. 2912. Repeal of superseded provision.
- Sec. 2913. Technical amendments.
- Sec. 2914. Authorizations of appropriations.

SEC. 2901. SHORT TITLE.

This title may be cited as the “Sikes Act Improvement Act of 1997”.

SEC. 2902. DEFINITION OF SIKES ACT FOR PURPOSES OF AMENDMENTS.

In this title, the term “Sikes Act” means the Act entitled “An Act to promote effectual planning, development, maintenance, and coordination of wildlife, fish, and game conservation and rehabilitation in military reservations”, approved September 15, 1960 (16 U.S.C. 670a et seq.), commonly referred to as the “Sikes Act”.

SEC. 2903. CODIFICATION OF SHORT TITLE OF ACT.

The Sikes Act (16 U.S.C. 670a et seq.) is amended by inserting before title I the following new section:

“SECTION 1. SHORT TITLE.

“This Act may be cited as the ‘Sikes Act’.”.

SEC. 2904. PREPARATION OF INTEGRATED NATURAL RESOURCES MANAGEMENT PLANS.

(a) **IN GENERAL.**—Section 101 of the Sikes Act (16 U.S.C. 670a(a)) is amended by striking out subsection (a) and inserting in lieu thereof the following new subsection:

“(a) **AUTHORITY OF SECRETARY OF DEFENSE.**—

“(1) **PROGRAM.**—

“(A) **IN GENERAL.**—The Secretary of Defense shall carry out a program to provide for the conservation and rehabilitation of natural resources on military installations.

“(B) **INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN.**—To facilitate the program, the Secretary of each military department shall prepare and implement an integrated natural resources management plan for each military installation in the United States under the jurisdiction of the Secretary, unless the Secretary determines that the absence of significant natural resources on a particular installation makes preparation of such a plan inappropriate.

“(2) **COOPERATIVE PREPARATION.**—The Secretary of a military department shall prepare each integrated natural resources management plan for which the Secretary is responsible in cooperation with the Secretary of the Interior, acting through the Director of the United States Fish and Wildlife Service, and the head of each appropriate State fish and wildlife agency for the State in which the military installation concerned is located. Consistent with paragraph (4), the resulting plan for the military installation shall reflect the mutual agreement of the parties concerning conservation, protection, and management of fish and wildlife resources.

“(3) **PURPOSES OF PROGRAM.**—Consistent with the use of military installations to ensure the preparedness of the Armed Forces, the Secretaries of the military departments shall carry out the program required by this subsection to provide for—

“(A) the conservation and rehabilitation of natural resources on military installations;

“(B) the sustainable multipurpose use of the resources, which shall include hunting, fishing, trapping, and non-consumptive uses; and

“(C) subject to safety requirements and military security, public access to military installations to facilitate the use.

“(4) **EFFECT ON OTHER LAW.**—Nothing in this title—

“(A)(i) affects any provision of a Federal law governing the conservation or protection of fish and wildlife resources; or

“(ii) enlarges or diminishes the responsibility and authority of any State for the protection and management of fish and resident wildlife; or

“(B) except as specifically provided in the other provisions of this section and in section 102, authorizes the Secretary of a military department to require a Federal license or permit to hunt, fish, or trap on a military installation.”.

Sikes Act
Improvement Act
of 1997.
Natural
resources.
Fish and wildlife.

16 USC 670 note.

(b) CONFORMING AMENDMENTS.—Title I of the Sikes Act is amended—

(1) in section 101(b)(4) (16 U.S.C. 670a(b)(4)), by striking out “cooperative plan” each place it appears and inserting in lieu thereof “integrated natural resources management plan”;

(2) in section 101(c) (16 U.S.C. 670a(c)), in the matter preceding paragraph (1), by striking out “a cooperative plan” and inserting in lieu thereof “an integrated natural resources management plan”;

(3) in section 101(d) (16 U.S.C. 670a(d)), in the matter preceding paragraph (1), by striking out “cooperative plans” and inserting in lieu thereof “integrated natural resources management plans”;

(4) in section 101(e) (16 U.S.C. 670a(e)), by striking out “Cooperative plans” and inserting in lieu thereof “Integrated natural resources management plans”;

(5) in section 102 (16 U.S.C. 670b), by striking out “a cooperative plan” and inserting in lieu thereof “an integrated natural resources management plan”;

(6) in section 103 (16 U.S.C. 670c), by striking out “a cooperative plan” and inserting in lieu thereof “an integrated natural resources management plan”;

(7) in section 106(a) (16 U.S.C. 670f(a)), by striking out “cooperative plans” and inserting in lieu thereof “integrated natural resources management plans”; and

(8) in section 106(c) (16 U.S.C. 670f(c)), by striking out “cooperative plans” and inserting in lieu thereof “integrated natural resources management plans”.

(c) REQUIRED ELEMENTS OF PLANS.—Section 101(b) of the Sikes Act (16 U.S.C. 670a(b)) is amended—

(1) by striking out “(b) Each cooperative” and all that follows through the end of paragraph (1) and inserting in lieu thereof the following:

“(b) REQUIRED ELEMENTS OF PLANS.—Consistent with the use of military installations to ensure the preparedness of the Armed Forces, each integrated natural resources management plan prepared under subsection (a)—

“(1) shall, to the extent appropriate and applicable, provide for—

“(A) fish and wildlife management, land management, forest management, and fish- and wildlife-oriented recreation;

“(B) fish and wildlife habitat enhancement or modifications;

“(C) wetland protection, enhancement, and restoration, where necessary for support of fish, wildlife, or plants;

“(D) integration of, and consistency among, the various activities conducted under the plan;

“(E) establishment of specific natural resource management goals and objectives and time frames for proposed action;

“(F) sustainable use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources;

“(G) public access to the military installation that is necessary or appropriate for the use described in subparagraph (F), subject to requirements necessary to ensure safety and military security;

“(H) enforcement of applicable natural resource laws (including regulations);

“(I) no net loss in the capability of military installation lands to support the military mission of the installation; and

“(J) such other activities as the Secretary of the military department determines appropriate;”;

(2) in paragraph (2), by adding “and” at the end;

(3) by striking out paragraph (3);

(4) by redesignating paragraph (4) as paragraph (3); and

(5) in paragraph (3)(A) (as so redesignated), by striking out “collect the fees therefor,” and inserting in lieu thereof “collect, spend, administer, and account for fees for the permits.”.

SEC. 2905. REVIEW FOR PREPARATION OF INTEGRATED NATURAL RESOURCES MANAGEMENT PLANS.

16 USC 670a note.

(a) DEFINITIONS.—In this section, the terms “military installation” and “United States” have the meanings provided in section 100 of the Sikes Act (as added by section 2911).

(b) REVIEW OF MILITARY INSTALLATIONS.—

(1) REVIEW.—Not later than 270 days after the date of enactment of this Act, the Secretary of each military department shall—

(A) review each military installation in the United States that is under the jurisdiction of that Secretary to determine the military installations for which the preparation of an integrated natural resources management plan under section 101 of the Sikes Act (as amended by this title) is appropriate; and

(B) submit to the Secretary of Defense a report on the determinations. Reports.

(2) REPORT TO CONGRESS.—Not later than one year after the date of enactment of this Act, the Secretary of Defense shall submit to Congress a report on the reviews conducted under paragraph (1). The report shall include—

(A) a list of the military installations reviewed under paragraph (1) for which the Secretary of the appropriate military department determines that the preparation of an integrated natural resources management plan is not appropriate; and

(B) for each of the military installations listed under subparagraph (A), an explanation of each reason such a plan is not appropriate.

(c) DEADLINE FOR INTEGRATED NATURAL RESOURCES MANAGEMENT PLANS.—Not later than three years after the date of the submission of the report required under subsection (b)(2), the Secretary of each military department shall, for each military installation with respect to which the Secretary has not determined under subsection (b)(2)(A) that preparation of an integrated natural resources management plan is not appropriate—

(1) prepare and begin implementing such a plan in accordance with section 101(a) of the Sikes Act (as amended by this title); or

(2) in the case of a military installation for which there is in effect a cooperative plan under section 101(a) of the Sikes Act on the day before the date of enactment of this Act, complete negotiations with the Secretary of the Interior and the heads of the appropriate State agencies regarding changes to the plan that are necessary for the plan to constitute an integrated natural resources management plan that complies with that section, as amended by this title.

(d) **PUBLIC COMMENT.**—The Secretary of each military department shall provide an opportunity for the submission of public comments on—

(1) integrated natural resources management plans proposed under subsection (c)(1); and

(2) changes to cooperative plans proposed under subsection (c)(2).

SEC. 2906. TRANSFER OF WILDLIFE CONSERVATION FEES FROM CLOSED MILITARY INSTALLATIONS.

Section 101(b)(3)(B) of the Sikes Act (16 U.S.C. 670a(b)) (as redesignated by section 2904(c)(4)) is amended by inserting before the period at the end the following: “, unless the military installation is subsequently closed, in which case the fees may be transferred to another military installation to be used for the same purposes”.

SEC. 2907. ANNUAL REVIEWS AND REPORTS.

Section 101 of the Sikes Act (16 U.S.C. 670a) is amended by adding at the end the following new subsection:

“(f) **REVIEWS AND REPORTS.**—

“(1) **SECRETARY OF DEFENSE.**—Not later than March 1 of each year, the Secretary of Defense shall review the extent to which integrated natural resources management plans were prepared or were in effect and implemented in accordance with this title in the preceding year, and submit a report on the findings of the review to the committees. Each report shall include—

“(A) the number of integrated natural resources management plans in effect in the year covered by the report, including the date on which each plan was issued in final form or most recently revised;

“(B) the amounts expended on conservation activities conducted pursuant to the plans in the year covered by the report; and

“(C) an assessment of the extent to which the plans comply with this title.

“(2) **SECRETARY OF THE INTERIOR.**—Not later than March 1 of each year and in consultation with the heads of State fish and wildlife agencies, the Secretary of the Interior shall submit a report to the committees on the amounts expended by the Department of the Interior and the State fish and wildlife agencies in the year covered by the report on conservation activities conducted pursuant to integrated natural resources management plans.

“(3) **DEFINITION OF COMMITTEES.**—In this subsection, the term ‘committees’ means—

“(A) the Committee on Resources and the Committee on National Security of the House of Representatives; and

“(B) the Committee on Armed Services and the Committee on Environment and Public Works of the Senate.”.

SEC. 2908 COOPERATIVE AGREEMENTS.

Section 103a of the Sikes Act (16 U.S.C. 670c-1) is amended—

(1) in subsection (a), by striking out “Secretary of Defense” and inserting in lieu thereof “Secretary of a military department”;

(2) by striking out subsection (b) and inserting in lieu thereof the following new subsection:

“(b) **MULTIYEAR AGREEMENTS.**—Funds appropriated to the Department of Defense for a fiscal year may be obligated to cover the cost of goods and services provided under a cooperative agreement entered into under subsection (a) or through an agency agreement under section 1535 of title 31, United States Code, during any 18-month period beginning in that fiscal year, without regard to whether the agreement crosses fiscal years.”.

SEC. 2909. FEDERAL ENFORCEMENT.

Title I of the Sikes Act is amended—

(1) by redesignating section 106 (16 U.S.C. 670f) as section 108; and

(2) by inserting after section 105 (16 U.S.C. 670e) the following new section:

“SEC. 106. FEDERAL ENFORCEMENT OF OTHER LAWS.

16 USC 670e-1.

“All Federal laws relating to the management of natural resources on Federal land may be enforced by the Secretary of Defense with respect to violations of the laws that occur on military installations within the United States.”.

SEC. 2910. NATURAL RESOURCES MANAGEMENT SERVICES.

Title I of the Sikes Act is amended by inserting after section 106 (as added by section 2909) the following new section:

“SEC. 107. NATURAL RESOURCES MANAGEMENT SERVICES.

16 USC 670e-2.

“To the extent practicable using available resources, the Secretary of each military department shall ensure that sufficient numbers of professionally trained natural resources management personnel and natural resources law enforcement personnel are available and assigned responsibility to perform tasks necessary to carry out this title, including the preparation and implementation of integrated natural resources management plans.”.

SEC. 2911. DEFINITIONS.

Title I of the Sikes Act is amended by inserting before section 101 (16 U.S.C. 670a) the following new section:

“SEC. 100. DEFINITIONS.

16 USC 670.

“In this title:

“(1) **MILITARY INSTALLATION.**—The term ‘military installation’—

“(A) means any land or interest in land owned by the United States and administered by the Secretary of Defense or the Secretary of a military department, except

land under the jurisdiction of the Assistant Secretary of the Army having responsibility for civil works;

“(B) includes all public lands withdrawn from all forms of appropriation under public land laws and reserved for use by the Secretary of Defense or the Secretary of a military department; and

“(C) does not include any land described in subparagraph (A) or (B) that is subject to an approved recommendation for closure under the Defense Base Closure and Realignment Act of 1990 (part A of title XXIX of Public Law 101-510; 10 U.S.C. 2687 note).

“(2) STATE FISH AND WILDLIFE AGENCY.—The term ‘State fish and wildlife agency’ means the one or more agencies of State government that are responsible under State law for managing fish or wildlife resources.

“(3) UNITED STATES.—The term ‘United States’ means the States, the District of Columbia, and the territories and possessions of the United States.”.

SEC. 2912. REPEAL OF SUPERSEDED PROVISION.

Section 2 of the Act of October 27, 1986 (Public Law 99-561; 16 U.S.C. 670a-1), is repealed.

SEC. 2913. TECHNICAL AMENDMENTS.

Title I of the Sikes Act, as amended by this title, is amended—

(1) in the heading for the title, by striking out “MILITARY RESERVATIONS” and inserting in lieu thereof “MILITARY INSTALLATIONS”;

(2) in section 101(b)(3) (16 U.S.C. 670a(b)(3)), as redesignated by section 2904(c)(4)—

(A) in subparagraph (A), by striking out “the reservation” and inserting in lieu thereof “the installation”; and

(B) in subparagraph (B), by striking out “the military reservation” and inserting in lieu thereof “the military installation”;

(3) in section 101(c) (16 U.S.C. 670a(c))—

(A) in paragraph (1), by striking out “a military reservation” and inserting in lieu thereof “a military installation”; and

(B) in paragraph (2), by striking out “the reservation” and inserting in lieu thereof “the installation”;

(4) in section 101(e) (16 U.S.C. 670a(e)), by striking “the Federal Grant and Cooperative Agreement Act of 1977 (41 U.S.C. 501 et seq.)” and inserting “chapter 63 of title 31, United States Code”;

(5) in section 102 (16 U.S.C. 670b), by striking out “military reservations” and inserting in lieu thereof “military installations”; and

(6) in section 103 (16 U.S.C. 670c)—

(A) by striking out “military reservations” and inserting in lieu thereof “military installations”; and

(B) by striking out “such reservations” and inserting in lieu thereof “the installations”.

SEC. 2914. AUTHORIZATIONS OF APPROPRIATIONS.

(a) CONSERVATION PROGRAMS ON MILITARY INSTALLATIONS.—Subsections (b) and (c) of section 108 of the Sikes Act (as redesignated by section 2909(1)) are each amended by striking out “1983”

and all that follows through “1993,” and inserting in lieu thereof “1998 through 2003.”.

(b) CONSERVATION PROGRAMS ON PUBLIC LANDS.—Section 209 of the Sikes Act (16 U.S.C. 670e) is amended—

(1) in subsection (a), by striking out “the sum of \$10,000,000” and all that follows through “to enable the Secretary of the Interior” and inserting in lieu thereof “\$4,000,000 for each of fiscal years 1998 through 2003, to enable the Secretary of the Interior”; and

(2) in subsection (b), by striking out “the sum of \$12,000,000” and all that follows through “to enable the Secretary of Agriculture” and inserting in lieu thereof “\$5,000,000 for each of fiscal years 1998 through 2003, to enable the Secretary of Agriculture”.

DIVISION C—DEPARTMENT OF ENERGY NATIONAL SECURITY AUTHORIZATIONS AND OTHER AUTHORIZATIONS

TITLE XXXI—DEPARTMENT OF ENERGY NATIONAL SECURITY PROGRAMS

Subtitle A—National Security Programs Authorizations

Sec. 3101. Weapons activities.

Sec. 3102. Environmental restoration and waste management.

Sec. 3103. Other defense activities.

Sec. 3104. Defense nuclear waste disposal.

Subtitle B—Recurring General Provisions

Sec. 3121. Reprogramming.

Sec. 3122. Limits on general plant projects.

Sec. 3123. Limits on construction projects.

Sec. 3124. Fund transfer authority.

Sec. 3125. Authority for conceptual and construction design.

Sec. 3126. Authority for emergency planning, design, and construction activities.

Sec. 3127. Funds available for all national security programs of the Department of Energy.

Sec. 3128. Availability of funds.

Sec. 3129. Transfers of defense environmental management funds.

Subtitle C—Program Authorizations, Restrictions, and Limitations

Sec. 3131. Memorandum of understanding for use of national laboratories for ballistic missile defense programs.

Sec. 3132. Defense environmental management privatization projects.

Sec. 3133. International cooperative stockpile stewardship.

Sec. 3134. Modernization of enduring nuclear weapons complex.

Sec. 3135. Tritium production.

Sec. 3136. Processing, treatment, and disposition of spent nuclear fuel rods and other legacy nuclear materials at the Savannah River Site.

Sec. 3137. Limitations on use of funds for laboratory directed research and development purposes.

Sec. 3138. Pilot program relating to use of proceeds of disposal or utilization of certain Department of Energy assets.

Sec. 3139. Modification and extension of authority relating to appointment of certain scientific, engineering, and technical personnel.

Sec. 3140. Limitation on use of funds for subcritical nuclear weapons tests.

Sec. 3141. Limitation on use of certain funds until future use plans are submitted.

Subtitle D—Other Matters

Sec. 3151. Plan for stewardship, management, and certification of warheads in the nuclear weapons stockpile.

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 shot 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.

BUSINESS

Section
D

Sunday, December 27, 1998

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 1,600 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. 5 (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.



Daily News-Miner



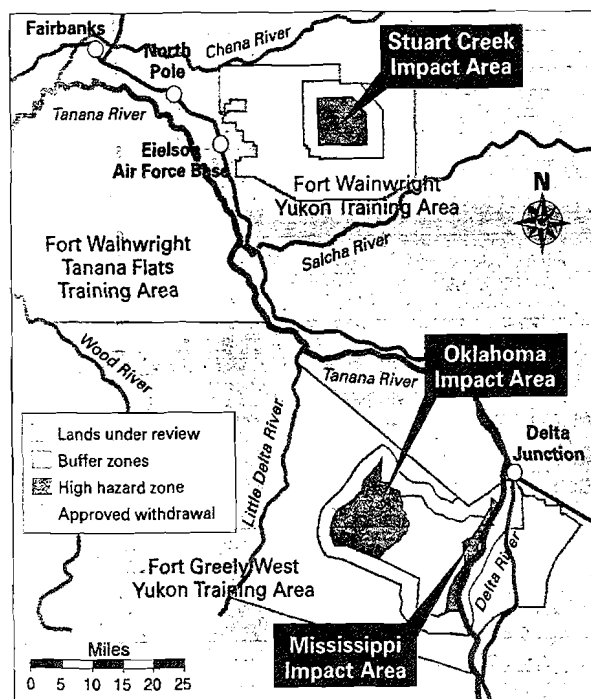
The Voice of Interior Alaska

VOL. XCVII, No. 17

FAIRBANKS, ALASKA, MONDAY, JANUARY 18, 1999

75 cents per copy

24 Pages



Army seeks lease extension

Two vast Interior military training ranges under scrutiny

By BRIAN O'DONOGHUE
Staff Writer

The tenant hasn't been the easiest.

After decades of bombing and burning what was once magnificent Interior Alaska real estate, those properties are so littered with dangerous live rounds that few believe a complete cleanup is feasible.

Now that same tenant wants a 50-year extension on its free lease in the name of national security.

"This is the largest and best training area the Army has," said Lt. Gen. William Steele, commander of the U.S. Army Pacific, during last year's Northern Edge exercise.

The lands under discussion are two vast Interior training ranges—Fort Wainwright's 248,000-acre Yukon Training Range and a two-piece 660,000-acre training area at Fort Greely—portions of which are veritable no-man's lands.

Congress last renewed the military use of the Interior blocks in 1986, granting U.S.

Army Alaska 15 more years of possession but tying any future extension to completion of an environmental impact study.

The land grant expires Nov. 6, 2001, opening the door to the state's request for acreage bordering the Chena River State Recreation Area; expanded access to timber, mineral, hunting and fishing resources; and additional wildlife protection measures.

A lengthy draft environmental study examines just two choices: reopening the lands to public use, and granting the Defense Department's request for an additional 50 years possession. Shorter alternatives weren't considered, according to the study, because it was unlikely to result in any change in the military's stewardship.

The study, open to public comment through Feb. 7, lists military control as the best option.

Jim Messer, longtime chairman of the Greater Fairbanks Chamber of Commerce's military affairs committee, believes Fort

Wainwright and Eielson Air Force Base have survived recent military cutbacks because of the maneuvering room represented by the lands up for renewal.

"They aren't here to defend Fairbanks," Messer said. "They're here to train."

Loss of those installations would savage the local economy, directly eliminating one-third of the paychecks drawn in the Fairbanks North Star Borough, according to Bob Logan, an economics professor and former borough assemblyman hired by the federal government to study socioeconomic effects of the lands withdrawal.

"I'm shocked," Logan told the News-Miner during a recent Carlson Center meeting on the draft study. "I had no idea how important the military was here."

A range of concerns

Delta resident Ed Sheehan, a retired lieutenant colonel, former head of the Army's

See RANGE, Page A-6

RANGE: Army leases

Continued from Page A-1

Northern Warfare Training Center and longtime Fort Greely range manager, has used the platform offered by the draft study to raise serious questions about the military's activities in the Fort Greely range.

Sheehan's allegations, presented at public meetings and as written comments entered into the study's record, include complaints about undocumented contamination, mapping errors of the high-impact areas, safety threats from the use of aircraft equipped with targeting lasers and the loss of Fort Greely's helicopter rescue unit.

The study directly addresses many of Sheehan's concerns; others it simply transcribed and ignored, including arguably the most serious charge leveled by the former range manager.

"This dud-picking up business started in '82," Sheehan stated at a Dec. 2, 1997, study meeting in Delta. "Before that, they used to send statements, certificates that said there were no duds or all duds were cleaned up. So you know, I wouldn't pray out in the (Fort Greely) Oklahoma bombing range."

Sheehan, in a recent interview with the News-Miner, said the reference to false reports was based on second-hand information concerning paperwork associated with the post's range control office. "I know we used to get papers back saying activity had been done when it wasn't done."

Sheehan maintains his concerns about the impact areas are being addressed.

"I've been trying to get them to own up to where it's bad and not to make any more (high-impact areas) if you can help it. They say they're going to do that from here on out," he said. "I'm satisfied they're going to do that."

Others argue the draft study lacks credibility unless the former range manager's complaints receive full investigation.

"If Sheehan's comments are accurate, it seems unwise to extend the military's occupation of this land for the next century," wrote Dan O'Neill, author of "The Firecracker Boys," an expose of Cold War-era plans for exploding nuclear devices in Bush Alaska.

Ross Coen, wilderness coordinator for the Northern Alaska Environmental Center, said his group wants to see the lands withdrawal tied to a commitment on identifying and removing all contamination, including old shrapnel and fuel spills.

"That's a pretty logical thing to ask for," Coen said, adding that any long-term withdrawal agreement should be subject to review if new wildlife or environmental hazards emerge.

Sheehan, meanwhile, says his goal remains confinement of the hazardous activity, not perfection in the form of a sky-is-the-limit removal of old shells and other munitions that may lurk under the surface of the Delta River and other glacial-fed waterways within Fort Greely's old bombing range.

"The way that silt piles up, I would guess you'd have to stop the flow of water through the Delta and dig down 25 feet all the way from Jarvis Creek to Don-

nely Creek. Then you'd have to sift it. And when you're all done would you sign your name to the paper saying it was clean?"

"It would be absurd to do it."

Jim Bruen, a civilian serving as the Army's range manager in Alaska, said the swift-moving Delta River, in a sense, takes care of itself. "The rolling boulders in there grind stuff up like a ball mill."

Expensive duds

Defense Department appreciation for Alaska's spacious training room is only part of the rationale offered for extending the Interior lands withdrawal. The draft study also cites a fiscal argument for leaving lands bombed beyond redemption under military control.

"Since military training and testing has occurred on these lands for nearly 50 years, with portions dedicated as high hazard impact areas," the draft notes, "it is likely that a complete decontamination would be extremely expensive and technologically challenging."

The study pegged the starting cost of a full cleanup at \$250 million.

That estimate was derived from the military's experience rehabilitating other training areas, including a Yakima, Wash., installation where the cleanup cost \$1 million an acre, said Cal Bagley, project manager for the Interior study, which is being conducted under a \$1.2 million Defense Department contract with the Center for Ecological Management of Military Lands, a military planning group based at Colorado State University.

The Air Force periodically clears unspent ordnance from portions of each bombing range so airmen can repair the cars, drums and other targets used in the annual Cope Thunder air-to-ground live-fire exercises.

"On average, one-fifth of the impact areas are cleared each year of live ordnance and munitions residue," the study states.

But no one is pretending the cleanup program will remove all threats in a set period of time.

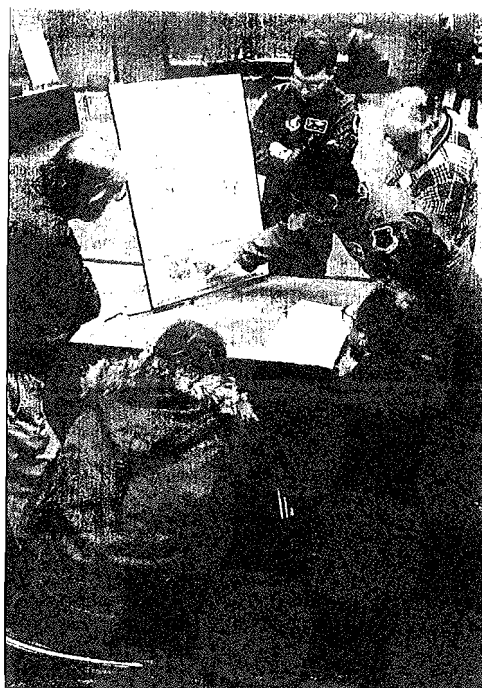
"The Air Force has an easier job cleaning up," observed Bruen, the Army's range manager in Alaska. "The things they're hunting are big enough to be seen, found and destroyed."

"Looking for artillery shells that have dudded—it's not as easy to do that. What that should mean to the average guy is stay the hell out of there."

Body counts

In 1980, mass duck deaths were reported at a range used for live-fire training near Anchorage. It took 10 years and a multi-agency task force to identify the culprit: eraser-size phosphorus pellets used in artillery sighting rounds. The pellets, which usually flare on contact with air, were sinking in the area wetlands, where they lurked until ducks gobbled them up. All told, \$20 million has been spent cleaning up Eagle River Flats, and the job isn't finished, according to Army Alaska spokesman Chuck Canterbury. The case has led the military to ban such shells from use near wetlands nationwide.

No comparable threat to a



Sam Harrel/News-Miner

LAND HEARING—U. S. Air Force Maj. David Ennis, right, points to a map as he explains the Air Force use of the Stuart Creek impact area during a public hearing at the Carlson Center on Jan. 6. The public hearing offered information on the military land withdrawals that expire in 2001. The U.S. Army is asking Congress to renew them for 50 years.

local wildlife population has ever been detected at the military's Interior training ranges, according to Bruen, Sheehan and others familiar with withdrawal lands.

Steve Dubois, the state's area biologist, confirmed there has been no widespread wildlife damage associated with the Fort Greely range, but he recalled one notorious case.

"A group of bison were mortared," said Dubois, citing an incident he believes took place in the mid-1970s. "Several were hit in the artillery barrage and killed."

For years, Fort Greely's range has been popularly linked with a mass caribou kill reported in June 1972. The circumstances were suspicious: more than 50 caribou found dead in a relatively small glacial basin located just north of the range. State biologists' initial inspection was inconclusive, and no toxins were detected in samples collected from what were by then partially consumed carcasses.

The cause wasn't apparent until investigators flew out aboard a helicopter on a day clear enough to see a radiant pattern connecting the carcasses.

"Lightning hit that wet ground and zapped all the caribou," Sheehan recalled.

A paper state biologists published in the October 1973 issue of the Journal of Wildlife Diseases reported the entire herd was electrocuted by a single lightning bolt, which fanned out through the tundra's surface in what was described as a classic "Lichtenberg pattern" of trenches, roughly 3 inches deep, 7 inches wide and up to 180 feet long.

Pat Valkenberg, a state car-

ibou biologist, said Delta's herd occasionally calves within one of Fort Greely's designated high-impact areas.

"It doesn't happen every year, and the Army's always been very good about stopping the bombing," observed the biologist, who admits to occasionally flouting the range rules by landing amid craters to change radio collars. "It's probably foolish on my part."

Years of monitoring caribou activity on the range has reduced the state's concern about the effects of live-fire exercises, according to Valkenberg. "The Delta Herd has more or less adapted to the levels of artillery activity."

Each subject area of the draft study recaps mitigation measures now in effect. The study also contains recommendations for new monitoring plans, soil and water sampling, and operational curbs to be attached to the military's continued use of the land.

Control of the lands themselves, however, is generally characterized as best left in the military's hands. For example, the state's pitch to expand Chena River State Recreation Area with a 13,440 acre slice of the Yukon range's Stuart Creek buffer zone was neatly shot down.

"Loss of the Beaver Creek-South Fork area would severely hamper the use of northern target formations ... 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."

JJ

**NORTHRIDGE EXPLORATION
EXPLORING ALASKA**

**David H. Johnson
P.O. Box 84330
Fairbanks, AK 99708**

February 4, 1999

Ms. Cindy Herdrich
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. Herdrich:

Upon review of the proposal to extend existing withdrawal of public land in Alaska for military purposes as in the LEIS, there are concerns to comment on.

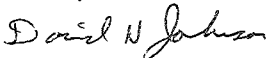
The mineralized land that are outside the "High Hazard Impact Area" and the "Impact Area Buffer Zone" as shown in Figures 2b thru 2e when compared to geology and minerals shown in Figures 3.4a and b and 3.5a thru 3.5c.

Another approach would be for the withdrawal period not to exceed a period of ten (10) years, or no longer than November 6, 2011. This then would obligate 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 desires to get title to all or parts of the existing withdrawal.

The LEIS also argues that "mining activities" (page ES-7) "if not done carefully can destroy habitat and affect water quality, a reason why the existing military withdrawals should be extended for 50 years." As a miner, I strongly object 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 the State of Alaska. The Alaska State reclamation law is specifically to all lands in the state and this includes military lands. The statement should be deleted from the final LEIS.

Thank you for the opportunity to review and comment on these issues.

Sincerely,



David H. Johnson
Northridge Exploration

RESPONSES TO COMMENT JJ

MIN-JJ027

MIN-JJ027: These observations are correct, although the nature and extent of mineralization is not known. Presumably, the commentor is suggesting that these areas could be opened to mineral entry.

ALT-JJ067

ALT-JJ067: Noted. Thank you for your comments.

MIN-JJ028

MIN-JJ028: This statement will be modified in the final LEIS. Please refer to Executive Summary.

KK



February 9, 1999

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

Dear Ms. Herdrich:

For more than 50 years Fort Greely and the City of Delta Junction have worked together to make a great community and support a strong military. The council for the City of Delta Junction is opposed to a 50-year continuation of withdrawal from public use for over 660,000 acres to continue the mission at Fort Greely. In the past, and before BRAC realignment, the withdrawal had been reviewed more frequently. There is no reason to change this policy.

The action of BRAC has had devastating effects on the community and to not have input by the community for 50 years, yet continue to practice bombing activities in our back yard, falls short of what is considered to be acceptable. The community has lived with bombs going off at all hours knowing that there are jobs for the community at Fort Greely. Now, sadly, it seems to be a different story. The current base realignment indicates there will be very few military personnel located in this area.

In the case of the proposed Missile Defense System, the City Council could see a rationale for supporting any area identified as necessary to the system. If the missile system has a life of 60 years, then a 50-year continuation is acceptable for this identified purpose. This would once again make the Army an economic participant in our community.

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. Tourists finding the tranquil, pristine wilderness they seek missing in this area during the military

ALT-KK068

SOC-KK017

RESPONSES TO COMMENT KK

ALT-KK068: 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.

Army management of the withdrawal lands will be conducted under Integrated Natural Resources Management Plans (INRMP) developed in accordance with the Sikes Act. INRMPs are written for a five year period with public and State and Federal agency participation in the development process.

SOC-KK017: The Base Realignment and Closure and the Ballistic Missile Defense Organization System are outside the scope of this LEIS. Separate National Environmental Policy Act (NEPA) documents are being developed for these actions.

USE-KK044: 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.

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. Proposed military activities on the withdrawal lands for the renewal period will be consistent with those conducted during the past 15 years. Any changes in the military's mission in Alaska will require appropriate NEPA documentation be completed.

MIT-KK020: Please refer to responses for POL-A001. 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). 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. The goals of ITAM are to evaluate, repair, maintain, and enhance training lands at Army training installations. Please refer to Appendix 2.D for a detailed description of the ITAM program.

KK

exercises, so they frequently decide to look elsewhere in Alaska. Without Fort Greely here in full force, we will be looking for tourist dollars to help support our economy.

There are many issues that the City has determined that need to be addressed. They are as follows:

1. **Expansion of impact areas and testing activity.** The Army's draft LEIS provides unorganized statistical data regarding testing activities and simply does not address the real concern of increased testing activity to the Fort Greely training areas. Military use data compiled for years 1989 through 1994 indicates an increase in high explosive use over the same five-year period. Draft LEIS at Appendix 2.B. For example, in 1989, the military used explosives for 20 days at site 22. In 1994, high explosives were employed for 250 days at the same site. Draft LEIS at APP-35. The Army provides no information regarding the magnitude of testing activity and whether the testing will occur on unspoiled lands. **USE-KK044**
2. **Insufficient decontamination operations.** Decontamination operations are apparently conducted on a yearly basis, with only one-fifth of the impact areas cleared each year of live ordnance ammunition residue. Draft LEIS at 2-25. The military's use of these lands for target practice has resulted in permanent contamination of the withdrawal lands. The Army accepts the contamination since a "complete decontamination would be extremely expensive and technologically challenging." Draft LEIS at 2-26. Local residents should be concerned that unexploded bombs may have traveled by water, wind or poor aim outside of the designated areas and into areas used by the public for recreation and hunting. In order to prevent a complete despoliation of all withdrawal lands and to protect nearby residents from unexploded munitions, the Army should expand decontamination operations outside of high impact areas. **MIT-KK020**
3. **No contamination studies.** Munitions are stored and deployed on Fort Greely for military training. The Army recognizes that the impact areas are contaminated with "exploded ordnance such as fragments of steel, filler material, munitions residue, and unexploded ordnance." Draft LEIS at 4-15. Yet, the draft LEIS fails to quantify the effect of ammunitions and hazardous waste contamination to the withdrawal parcels and nearby areas. Draft LEIS at 4-16. The Army recognizes the need for detailed soil contamination surveys and now proposes for the first time to conduct studies in the unspecified future. Draft LEIS at 4-19. **POL-KK017**
4. **Fuel spills.** Since 1986, there have been seventeen fuel spills on Fort Greely ranging from 15 to 1500 gallons in magnitude - that is, over one fuel spill every year. Draft LEIS at 2-21, 2-22. The Army confidently reports that it followed U.S. Army regulations for clean up, however, without any contamination study such a conclusion is without basis. Draft LEIS at 2-21. **POL-KK018**
5. **Protection of wildlife.** The Army recognizes the existence of sensitive habitats for wildlife species on the withdrawn lands, but fails to provide information/studies regarding the effects of military training on the wildlife. Draft LEIS at 3-55, 4-43. And while the Army apparently "consults" with outside agencies such as the U.S. Forest **WILD-KK020**

POL-KK017: Noted. Baseline studies have not been conducted for all resources at Fort Wainwright and Fort Greely. All existing baseline studies for those resources that have been 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 (see Chapter 4.23).

POL-KK018: Spill Prevention Control and Countermeasure (SPCC) Plans exist for Fort Wainwright and Fort Greely. These plans were required because these installations each have a total underground fuel storage capacity exceeding 42,000 gallons and a total aboveground fuel storage capacity exceeding 1,320 gallons (or has an aboveground tank with a capacity exceeding 660 gallons). These plans document methods implemented at the installations to prevent oil spills from reaching navigable waters. They include spill prevention, discovery, and emergency notification procedures. These plans require the documentation of equipment inspections, tests, and repairs; personnel fuel handling and spill response training; reportable spills; corrective actions to prevent recurring spills; and investigations including soil, surface water and/or groundwater.

Both aboveground and underground storage tanks have monitoring systems which include statistical and interstitial leak detection and overflow alarms. Large fuel tanks also have secondary containment structures.

State of Alaska regulations 18 AAC 75, Oil and Hazardous Substances Pollution Control and 18 AAC 78, Underground Storage Tanks, require all oil spills, regardless of size, to be reported to the Alaska Department of Environmental Conservation (ADEC). Spills will also be reported as soon as possible to the commander of the military unit or the immediate civilian supervisor. All oil spills require documentation and are distributed to appropriate State, Federal, and local agencies.

The spill report will include the following information: date and time of discharge; location of discharge; name of facility; person or persons causing or responsible for discharge; type of material spilled; estimated quantity of material spilled; cause and source of spill; potential impacts to environmentally sensitive areas (groundwater, surface water, soils, or wildlife); cleanup actions undertaken; estimated amount of spilled oil cleaned up; estimated amount of hazardous waste generated; date, location, and method of ultimate disposal of the hazardous substance and any contaminated materials; and actions being taken to prevent the recurrence of the discharge.

Releases of more than 55 gallons outside of secondary containment, or any discharge of oil into water, will be reported immediately to ADEC upon discovery. Releases of more than 10 gallons or more than 55 gallons within secondary containment will be reported to the ADEC within 48 hours of discovery. Releases of less than 10 gallons do not need to be reported to the ADEC, but a record of the release will be maintained.

WILD-KK020: Chapter 4.12, 4.13, 4.14 discuss the effects of military activities on wildlife. The Existing and Proposed Mitigation within of these sections discuss current military management to reduce impacts, the need for further studies of impacts to wildlife, and mitigation to reduce impacts.

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Service and the State of Alaska, conservation advice is not followed. For instance, the Army does not protect either the trumpeter swan or the osprey, both found to be sensitive species by the U.S. Forest Service. Draft LEIS at 3-67. Several types of passerines found to be species of concern by the State of Alaska are similarly unprotected. Draft LEIS at 3-67.

6. **Air quality.** Perhaps the most glaring problem with the Army's draft LEIS is the complete lack of scientific analysis regarding the environmental effects on the withdrawal parcels. 43 C.F.R. § 157(7) requires the Army specify to what extent the proposed use will affect federal laws relating to conservation and water resources of withdrawal lands. There is no specific air quality data collected at Fort Greely. Draft LEIS at 4-2. As a result, the contribution of pollutants resulting from military activities conducted on the withdrawal lands is unknown. Draft LEIS at 4-2. Yet, the Army presumes, without basis, that the air quality is "good." Draft LEIS at 3-8. The Army reports that Fairbanks is designated as non-attainment for carbon monoxide and has a relatively high suspended particulate concentration, apparently for the proposition and any military-related pollution at Fort Greely may be safely disregarded. Draft LEIS at 3-8. However, Delta Junction residents complain that military vehicles contribute to the ice fog/poor visibility and poor air quality in the area. Draft LEIS at SCP-101. If the air quality in the outlying areas is so poor, then it should be even more incumbent upon the military to minimize further pollution at Fort Greely.
7. **Water quality.** Several large streams flow through Fort Greely, such as the Delta River, Little Delta River, Jarvis Creek, 100-Mile Creek and Delta Creek. 43 U.S.C. § 157(8) requires the Army comply with State laws affecting any of the waters within the withdrawn lands. The Army reports that streams within Fort Greely are in compliance with State of Alaska standards set for primary contaminants and non-compliance with standards set for secondary contaminants. Draft LEIS at 3-34, 3-41, App-123. The measurements were taken over eight years ago and failed to test for many of the required organic chemical materials. See 18 AAC 80.070. The Army's testing methodology would certainly fail by today's standards for water quality. And while the secondary contaminants mainly affect the aesthetic qualities of drinking water, the Department of Environmental Conservation warns that health problems might result from higher levels of secondary contaminants alone. 18 AAC 80.070. Within the withdrawal lands, levels of secondary contaminants were found to significantly increase downstream. Draft LEIS at App-126. For example, the maximum contaminant level for aluminum is 0.2 mg/l. In the Delta River alone, aluminum levels increased downstream from 3.9 mg/l to 7.9 mg/l. Draft LEIS at App-123, App-126. Without a current test of water quality, there is no way of knowing how much of the chemical residues reach the nearby rivers and streams.
8. **Public access for hunting, fishing and recreational activities.** Several local citizens report that their public access to these areas have significantly decreased over the past few years. (LEIS at SCP-33, SCP-98) There is absolutely no reassurance from the Army that public access will improve or remain.

AIR-KK004

WATER-KK014

ACC-KK026

AIR-KK004: Areas given a designation of "attainment" (local air quality meets or exceeds the established air quality standards) can be considered to have good air quality. However, areas of "attainment" may still experience brief episodes of poor air quality due to forest fires and motor vehicles. In addition, non-point sources of air pollution may combine with emissions from other point and non-point sources, including civilian populations located outside the withdrawal boundaries and military activities at the Main Post, and influence air quality further. Various mitigation measures have been developed by the military to lessen the impacts of poor air quality episodes on the withdrawal areas.

Unnecessary vehicle idling is restricted on Fort Wainwright and Fort Greely. Head bolt electrical outlets (HBOs) have been installed in most parking lots on Fort Wainwright. HBOs allow vehicles to use engine preheating accessories that reduce "cold starts", which have been linked to increases in both carbon monoxide and unburned fuel emissions. This would also reduce the amount of idling of parked vehicles during extreme low temperatures, thus reducing the generation of ice fog.

Specific air quality data has not been collected at either Fort Wainwright Yukon Training Area or Fort Greely East and West Training Areas, but the air quality in these areas is considered good because they are outside of the "non-attainment" air quality control regions.

WATER-KK014: Recent surface water quality surveys have not been completed for the withdrawal lands by the military or any State or Federal entity. A limited site-specific water quality investigation of Fort Greely training lands was 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 during sampling and the data indicated the stream chemistries were not adversely affected by munitions. Please refer to Chapter 4.8.2 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). No other water samples collected within or nearby the withdrawal areas were analyzed for munitions by either military, Federal, State, or local entities.

Water quality data collection proved to be too sporadic to provide a comprehensive assessment of the water quality of the withdrawal areas. Also, an idea of current water quality could not be derived from these records. Appendix 3.8.D shows available water quality data for streams within the withdrawal areas.

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).

ACC-KK026: The Army permanently restricts access to approximately 9% of the withdrawal lands, leaving approximately 91% available for public access. Expansion of Impact Areas is not proposed in this LEIS and would require appropriate National Environmental Policy Act (NEPA) evaluation and documentation. Please refer to Chapter 3.16 for more information on access.

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9. **Lengthy withdrawal period.** The Army seeks, without justification, to extend the previous fifteen (15) year lease of public lands to 50 years. Draft LEIS at ES-6. See also Military Land Withdrawal Act of 1986 (Pub.L.99-606).
10. **Inadequate fire protection.** Division of Forestry representative Al Edgren, reports that roughly 30 fires a year are started in and around Fort Greely. Draft LEIS at SCP-28, 29. In contrast, the Army reports that since 1957, over 243,585 acres have burned from 72 fires started in the same area. Draft LEIS at 3-76. The Army also reports that 58 of the 72 fires started from incendiary causes resulting in 86 % of the total damage. Draft LEIS at SCP-28, 29. The Bureau of Land Management (BLM) has fire protection responsibility. Draft LEIS at 3-70. According to Edgren, BLM is 100 miles away from Fort Greely. Draft LEIS at SCP-30. BLM representatives Vic Wallace and Dave Mabraten, raised concerns regarding their ability to access fires on the withdrawn lands and the safety of those fighting fires on the lands. Draft LEIS at SCP-48. With no military personnel at Fort Greely available to fight fires, nearby communities such as Delta Junction are at placed at risk.
11. **Noise.** Delta Junction residents report that noise from sonic booms and low-flying aircraft "rattles houses" and "cracks foundations." Draft LEIS at SCP-84, SCP-101. The Army's draft LEIS does not address this concern.
12. **Mining.** One obvious effect of the Fort Greely realignment is the declining percentage of military employment in the City of Delta Junction. The economic potential for placer gold in the withdrawal lands may mean job opportunities for persons otherwise displaced by the realignment. Draft LEIS 4-9. However, the withdrawal lands are currently closed to mineral exploration and development. The withdrawn lands may be opened up to mineral activity pursuant to federal land and mining laws. Draft LEIS 4-10. However, no disposition or exploration will be authorized if the Secretary of Defense determines that exploration is "inconsistent with the military use of the lands so withdrawn." 43 U.S.C. § 158. If the withdrawal is not renewed then the military use restriction is no longer an obstacle to future mining of the area. Gold mining could certainly provide jobs that the military is currently taking away from the Delta area.

Thank you for taking time to read and address our concerns. We are a small community and have always worked well with the Army. They have been a life line for Delta Junction and are a part of the community. I hope we can continue this relationship in years to come.

Sincerely,

CITY OF DELTA JUNCTION


Roy Gilbertson
Mayor

ALT-KK069

ALT-KK069: 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.

FIRE-KK024

FIRE-KK024: 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 can record coordinates, and then contact the Bureau of Land Management, Alaska Fire Service (AFS). The ability of the fire department to report coordinates will not change after the BRAC.

NOISE-KK002

NOISE-KK002: 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 do not produce sonic booms).

MIN-KK029

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 4.23.

MIN-KK029: Some potential does exist for placer gold and possibly lode gold in the withdrawal areas, although no discoveries of significance have been documented.

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.

LL

Subject: [Fwd: Alaska Army Lands Withdrawal Renewal]
Date: Fri, 12 Feb 1999 07:00:09 -0700
From: CEMML <cemml@CEMML.ColoState.EDU>
To: Cindy Herdrich <CHerdrich@CEMML.ColoState.EDU>

Subject: Alaska Army Lands Withdrawal Renewal
Date: Wed, 10 Feb 1999 00:02:05 -0900
From: Richard/IGC <rmccaffrey@igc.org>
To: CEMML@CEMML.ColoState.EDU

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

9 Feb 99

Dear Ms. Herdrich,

This is a comment on the Draft Legislative Environmental Impact Statement regarding Alaska Army Lands Withdrawal concerning Forts Greeley and Wainwright. I want to express my concerns about the salmon fishery that depends upon the quality of the water originating on the watershed, and the fishers who depend upon the salmon.

WATER-LL015

It has come to light recently that the fall run of chum salmon, as well as other species of fish, depend on upwelling groundwater along the 30-mile stretch of the Tanana River below Big Delta, AK, for spawning. In Interior Alaska conditions are sub-arctic. The fall run of Chum salmon evidently seek the special gravel spawning beds that do not freeze, even during the of winter. Unlike in most areas, certain gravels don't freeze, even in the depth of the subarctic winter, evidently because these gravels are flushed with upwelling groundwater, which is warm in winter compared to the river water. Not warm enough to qualify as a warm spring, but warm enough to remain a few critical degrees above the freezing point. The thermal property of groundwater accounts, at least in part, for the existence of suitable winter spawning habitat.

FISH-LL007

The influence of water during winter of sufficient warmth to maintain possible spawning sites is one of the requirement for such habitat. Why the upwelling water is so warm is an open question. It may be that it is so because most of it infiltrates into the ground during summer and the water is "imprinted" by summer temperatures and shielded from sub-zero air temperature afterward while underground. Being warmer than ice, it tends to melt its way through permafrost and create flow channels ("taliks"). Taliks are most commonly formed beneath lakes and streams. When groundwater later emerges as an upwelling, it is warm relative to the cold glacial meltwater the supplies the great majority of the river water. A very different explanation of its temperature is conceivable, namely, that the upwelling water gets its heat from percolating hundreds of feet down into the to where the earth's temperature is significantly warmer due to geothermal heat flow. Such a process could potentially explain the warm water upwellings. Of course, a combination of processes

RESPONSES TO COMMENT LL

WATER-LL015: Noted. 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).

FISH-LL007: Please refer to responses POL-A001 and 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 determine if contamination from military activity occurs.

LL

is also possible. Although the detailed cause of the warmth is uncertain, the thermal quality of the water is critical to successful spawning. It is the particular qualities of the upwelling groundwater that makes the fishery possible.

A major concern of this nation over at least the last thirty years has been to maintain and improve water quality. Water qualities in addition to temperature are important for sustaining both human and wildlife populations. It is reasonable to assume that in regard to fish habitat, water temperature and other qualities, such as water chemical composition, are likely to be very important. However, little is known either about the chemical composition of the groundwater that upwells or the specific compositional requirements of spawning fish. It is known, however, that a minimum concentration of dissolved oxygen, about 5 parts per million, is needed for the survival of salmon eggs in spawning gravels. In most cases, the importance of other water properties in this regard is more speculative.

Most of the volume of water that forms the Tanana is derived from glaciers in the Alaska Range to the south. Much of it is derived directly from glacial melting. However, the water that sustains the spawning habitat is generally not the turbid glacially supplied river water, but is upwelling groundwater. This middle reach of the Tanana is, in fact, famous for its "clearwater" rivers, which reflect their proximate origin as groundwater. It is character of this groundwater that accounts for the water quality to which spawning salmon are exposed.

Thinking about the source of this water, I came to realize that these upwellings will be an expression of everything that has happened to that water since it originally fell as precipitation elsewhere on the watershed and made its tortuous way across the surface or through the ground to where it ultimately emerges at or near the river. This implies that the quality and quantity and timing of the upwelling groundwater is the final product of all of the biological, geochemical, hydrological, and climatological processes that influenced that piece of water on its odyssey from the mountains to the river.

It is this dawning realization that makes me be concerned about what has happening or is planned to happen on the watershed. I urge you to do what is necessary to ensure that the activities on the watershed do not result in degradation of this valuable fishery. It would be unfortunate if we fail to learn from our past mistakes, as exemplified by the Hanford-Columbia River-Salmon situation. This salmon fishery is one of the sustainable natural resources that Alaska will have to depend upon as the oil reservoirs are depleted. It takes a watershed to raise a salmon.

--Richard McCaffrey

PO Box 86, Ester, AK, 99725

MM

Ms. Cindy Herdich
 Ctr. for Ecol. Mgmt. of
 Military Lands
 Voc Ed. Bldg. Colo State Univ.
 Ft. Collins, CO 80523

25.99
 John D. Lyle
 P.O. Box 83715
 Fairbanks, Alaska
 99708

For the record, the Directorate of Public Works for the US Army, Mark Nelson, thanked readers for their participation in the process of participating in the draft LEIS which identified significant issues re: withdrawal renewal. If this were a genuine effort to solicit and incorporate and act upon the public's reaction, then 30 days is grossly inadequate. The public "Open House Meetings" were Jan. 5-7, 1999 and public comment expires Feb 7, 1999. This is not enough time, as designed by the US Army. "Open House" meetings are not adequate for collecting + documenting public concerns for the public record - again by design.

In a 1/26/99 AP article, Native villagers from Ft. Yukon are fearful of low level PCB contaminants from 1950 radar sites in the vicinity of their village, and demand all toxics be removed from their lands. US military spokesmen claim the concern is unwarranted. This may or may not be the case, but residents around Fairbanks are also concerned by US Military plans to expand bombing areas around Fairbanks, for many reasons.

RESPONSES TO COMMENT MM

OTH-MM037

OTH-MM037: The Notice of Availability for the Draft LEIS was published in the Federal Register on November 6, 1998. Public comments were accepted for a 90 day period extending from November 6, 1998 until February 7, 1999.

OTH-MM038

OTH-MM038: During the scoping process, both Open Houses and Public Hearings were held to obtain testimony. The positive feed-back 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.

USE-MM045

USE-MM045: U.S. Army Alaska is not proposing to expand bombing areas around Fairbanks. They are requesting to continue current military operations on the withdrawal lands in the Fairbanks area.

MM

Expanded military presence in and around

Fairbanks, and consequent increases in military operations (inc. bombing exercises), will increase the incidences of the following:

- 1) bombing-related forest fires in thick forests in Interior Alaska, increasing air pollution; loss of private + public property; loss of human, forest and animal life; increasing expenditure of state, local + federal funds for fire fighting and loss of subsistence hunting, trapping and fishing grounds for many residents.
- 2) increases in crime in our community. There already exists a high percentage, a disproportionately high proportion of crime committed by military personnel. Further increases in personnel and operations will surely also increase numbers of sexual and physical assaults, homicides, robberies and other violent crimes.
- 3) A bombing range on the headwaters of the Chena River would produce toxic runoff into our food supply, for thousands of years. Unexploded

FIRE-MM025

FIRE-MM025: The Army is concerned about incendiary-caused fires and their effects on State and private property and the surrounding communities. The Army enforces management to decrease possible fire hazards. Please review Chapter 4.15 for a discussion of this topic.

SOC-MM018

SOC-MM018: 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.

POL-MM019

POL-MM019: No baseline studies to assess the effects of munitions on soils, surface water, groundwater, vegetation, or wildlife have been completed for the Fort Wainwright Yukon Training Area, including Stuart Creek Impact Area 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 (see Chapter 4.23).

MM

ordinances issued per hazards to animals

④ Military sites in Alaska are among our and humans alike.

What, most persistent toxic waste sites. No military, take a good neighbor line, but then record is shaky. Navy Alaska do not trust the military to be good, responsible stewards of the land, and with good financial reason.

⑤ Abandoned mines and bombs are unethical.

Altering increased a scope of such ranges while the existing ranges haven't been properly cleared up is inappropriate. As well, why expand lands to bombing when much land has already been seriously degraded?

⑥ The US military has "a few hundred thousand" thousand highly hazardous areas up for lease renewal in 2001. That land ought to be enough. Any future bombing and shelling should be confined to those areas already contaminated. It appears to be extremely expensive if not impossible to clean up bombed areas 100%, so we should avoid creating new ones" ^{12/24/99} ~~12/24/99~~ ^{12/24/99} ~~12/24/99~~

POL-MM020

POL-MM020: Noted. Thank you for your comments.

USE-MM046

USE-MM046 and USE-MM047: U.S. Army Alaska is not requesting to increase its Impact Areas with the withdrawal renewal request. Military use will remain the same as in the past 15 years.

USE-MM047

⑦ Sure, the military offers much to the

Fairbanks business community economically, ~~cost~~ social and environmental costs have always been inadequately calculated and reported. Why? Why does this continue?

⑧ AP Article in 1/18/99 FON Miner: "Military Often Ignores Domestic Abuse" reinforces the previous point. Spousal abuse in the US military is FIVE times higher than in the general population. Secy of Defense Ann Cohen refused to speak to "60 minutes" recently about this issue. Sweep it under the carpet. We don't need more of this sort of thing in AK. We already have rates of abuse and violence much higher than the national average.

⑨ The military already has 2 vast interior training ranges (FWW's 248,000 acre "Yukon Training Range and Ft. Greely's 660,000 acre range. That totals close to a million acres of "no-man's land"; land trashed and off limits. Why do they need more? They don't need more. They have more than enough already.
FON Miner 1/18/99

SOC-MM019

SOC-MM019: Environmental costs to which the commentor refers to are not quantified in the socioeconomic analysis; however, environmental impacts are assessed throughout the LEIS.

SOC-MM020

SOC-MM020: 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.

USE-MM048

USE-MM048: U.S. Army Alaska is not requesting additional land for military training. It is requesting to renew the withdrawal lands it is currently using.

MM

⑩ No link has been made to cleaning up

existing toxic sites, inc. oil spills, PCB's, dioxins, old shrapnel, unexploded ordnance and oil spills. In 1980 a mass kill-off of ducks were reported near Anch. and linked to artillery rounds used and not cleaned up by the US military. To date \$20 million has been spent on cleaning the Eagle R. Flats and the job isn't finished. Who will pay for this clean up? Will it come out of the US military's annual budget? Don't count on it.

⑪. The US military's annual budget has never been a part of Congress' annual budget process. It happens separately and usually is a bipartisan blank check. Major clean up of military hazardous waste sites comes out of other federal EPA funds, not the military budget. The military created these thousands of sites around the country, and literally walks away from them. Swept under the carpet.

MIT-MM021

MIT-MM021: The Army's proposed mitigation would implement a program to gather baseline data to develop a long-term monitoring and remediation program for physical and biological resources (see Chapter 4.23).

Chapter 2.1.3.5 *Decontamination* contains an estimate of the total cost to clear the Impact Areas on the withdrawal lands.

OTH-MM039

OTH-MM039: Federal Agencies are not allowed to use Superfund money (EPA) at Federal facility sites (per CERCLA/SARA). Funds to clean-up Federal facilities comes from individual yearly Federal Agency Operation and Maintenance Accounts or from special funding passed by Congress, for example the Defense Environmental Restoration Account (DERA).

Clean-up of abandoned former military sites are funded under a Defense Environmental Restoration Account program known as Formerly Used Defense Sites. Base Realignment and Closure is a program of DERA also.

MM

② US Army Secretary Louis Caldera was in Alaska recently and says "We got bragging rights ... it feels good to say we've been in 30° below zero weather". Caldera's flash of military bravado doesn't ignore the accidents, esp. Alaska Natives who live and subsist in 70°

USE-MM049

USE-MM049: Noted.

(70° windchill) winters year after year. This is their home, their life. The Army's top man doesn't quite grasp all the implications of his diatribe of deploying more and more soldiers in Alaska. There is a cost to this. This is wilderness, precious undeveloped land, not a playground; not vacant, not worthless tundra. (On 11/20/99).

MIT-MM022

MIT-MM022: Noted.

③ Sec. Caldera says he wants to portray the US Army as a "good environmental steward". If so, he needs to clean up the horrible mess his employer created over the past several decades. He continues, "Today we're trying to remediate some of the mistakes of the past and make sure we don't repeat those mistakes..." We want to be known for our environmental record ...

MM

⑭ Plans to explode 3,500 rockets with

high explosives into the Chena River drainage are ridiculous. And additionally, to shoot 50,000 high explosives and drop 4,300 bombs in the same area is insane. How will these ordinances NOT contaminate the water and soil? The figures above are past, not proposed new statistics. Why increase then already exceedingly high figures?

⑮ US Army has not done any soil contamination studies as part of the draft LEIS. How can this be?

⑯ Unexploded ordnance pose grave danger to firefighters and increase threat of fires. Once fires start, ground fighters are unable to deal with the blaze, further increasing possibility of large scale forest fires.

⑰ I canoed and explored the Gerstle River, and not been aware of the large concentrations of some* of the most deadly chemical agents known to man. This large area drains into the Yukon River. It has not been assessed or cleaned up. Why? It would cost too much. So, no one pays, * nerve + mustard gas (FRAN/MAN 12/31/98).

USE-MM050

USE-MM050: The Military Lands Withdrawal Act, which authorized the military withdrawals at Fort Wainwright and Fort Greely, did not restrict the amount of military activity permitted. Proposed military activities on the withdrawal lands for the renewal period will be consistent with those conducted during the past 15 years. Any changes in the military's mission in Alaska would require the appropriate NEPA documentation be completed.

SOIL-MM009

SOIL-MM009: 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. They would determine the location, extent, and potential migration of contaminants in soils. Current decontamination efforts are described including an ordnance cleanup history by the Air Force (see Appendix 2.C).

FIRE-MM026

FIRE-MM026: All Impact Areas are listed by the Alaska Fire Service as Hot Zones. Firefighters are not allowed in these areas. Fires in Impact Areas can be fought with air support. The Army and Alaska Fire Service work closely to assure accessibility to the withdrawal lands for fire-fighting. Please refer to the Fire Protection Status Boundary maps (Figure 3.15.a and 3.15.b). Many of the Fire Protection Status Boundaries are coordinated with State Fire Protection Status Boundaries.

OTH-MM040

OTH-MM040: The Gerstle River Test Site is not part of this withdrawal renewal action.

MM

and people will suffer in the long term.

Again, swept under the carpet.

- ⑫ People don't necessarily agree w/ Senator Ted Stevens who wants to make Alaska the military training capital of the world. Federal monies should be used to clean up existing military toxic sites and dumps and bombing ranges, NOT expand them.
- ⑬ The "open house" was not a public hearing where testimony was collected for the public record. It was a white wash. It was inappropriate and insufficient.
- ⑭ The Draft LEIS doesn't address other factors such as loss of timber, ^{wildlife} habitat, subsistence (hunting, fishing + trapping areas) and recreational facilities for Alaskans.

As a citizen, an Alaskan, a teacher in rural Native Alaskan villages; as the Chair of the Friends (Quakers) Social Concerns Committee, and Chair of the Alaska Peace With Justice Council (totalling 300+ members) I strongly object to the US Army's proposal to expand operations in Alaska.
Sincerely, Ben D. Lyle

MIT-MM023: Noted.

OTH-MM041: During the scoping process, both Open Houses and Public Hearings were held to obtain testimony. The positive feed-back 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.

MIT-MM023

FOR-MM003: An assessment of the loss of timber and wildlife habitat has not been conducted on the withdrawal lands. The Alaska Department of Fish and Game works with the Army to decrease wildlife habitat loss. Proposed mitigation in the LEIS would increase the lands protected for wildlife. Timber loss due to military activity will be assessed in the Forest Management Plan for the withdrawal lands. While loss of timber and wildlife habitat for certain species occurs from incendiary-caused fires, these areas are then available as habitat for other species. The value placed on timber loss and associated wildlife habitat loss varies according to the resource being managed for in that particular area. Communication with the Bureau of Land Management indicated that public requests for timber harvesting on the withdrawal lands has been minimal. The Army will be conducting a Forest Inventory and assessing the possibility for timber harvesting on the withdrawal lands. Timber harvests would be managed by the Bureau of Land Management with agreement from the Army.

OTH-MM041

FOR-MM003

WILD-MM021

SUB-MM014

REC-MM010

WILD-MM021: See response FOR-MM003.

SUB-MM014: Changes to Chapter 4.20 have been made to reflect increased access of the withdrawal lands under the No Action Alternative. The transfer of former withdrawn lands to the State of Alaska would improve access for hunting, trapping, and fishing to some degree. Over 90% of the lands are already open to hunting, fishing, and trapping when military operations or safety hazards do not conflict.

Based on current subsistence use of the withdrawal lands, the effects of additional subsistence opportunities are likely not to be significant. The proposed action does not change access for subsistence over what has occurred during almost 50 years of military use. Fishing in particular would not be significantly impacted by the Preferred Alternative since almost all quality fishing lakes are open nearly year-round.

USE-MM051

REC-MM010: The LEIS does address this issue in Chapter 4.16 and 4.17. Also review responses SOC-T007 and SOC-T008.

USE-MM051: U.S. Army Alaska is not requesting to expand operations in Alaska as a part of this withdrawal renewal action.

NN

Delta Area Forestry
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Phone (907) 895-4225 Fax (907) 895-4934

MEMORANDUM
STATE OF ALASKA
Department of Natural Resources
Division of Forestry

To: Robert Layne
Division of Land

Date: February 9, 1999

Thru: Les Fortme *LF*

From: Al Edgren *AE*
Delta Area Forester

Re: Public Review Draft
Alaska Army Land Withdrawal EIS

The following are comments to the Public Review Draft of the Alaska Army Land Withdrawal Renewal Draft Environmental Impact Statement. Under Section 3.15 Fire Management there are several statements that are misleading or erroneous.

Page 3-70, paragraph 2: *Under the agreement the Alaska Fire Service is responsible for all fire detection and suppression on withdrawn lands.*

FIRE-NN027

The detection of fires has historically been done by the Fort Greely Fire Department or Range Control Officer. I am not aware that the BLM has provided this service. With the down sizing of the Base Fire Department, this document doesn't address how this service will be provided.

Page 3-71, paragraph 2: *Through the Reciprocal Fire Protection Agreement and the Annual Operating Agreement, the Department of Forestry has agreed to provide detection and initial attack suppression services for Fort Greely West and East Training Areas which lie within the Department of Forestry Protection Area.*

The BLM/State agreement is not written as stated above. We will provide initial attack and detection upon request and subject to available forces by the Military Fire Chief or the AFS Military FMO.

FIRE-NN028

The statement above implies that the East and West Training Areas are within the Division of Forestry's protection area. It is not. The BLM has retained the Fort Greely Withdrawn lands in its protection area.

Page 3-72, paragraph 5: *Unplanned areas are lands which have not been given an official designation but receive protection equal to that given lands in full.*

FIRE-NN029

On our latest Fire Management plans, the Gerstle River Test Site is designated "unplanned". This area has been designated for no suppression activity due to the hazardous materials assumed to be present.

RESPONSES TO COMMENT NN

FIRE-NN027: The Bureau of Land Management, Alaska Fire Service (AFS) 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 contacts the AFS. The ability of the Fire Department to report wildland fire locations will not change after the Base Realignment and Closure. The Alaska Fire Service will adopt necessary strategies as needed to maintain fire suppression response on withdrawal lands.

FIRE-NN028: Correction has been made. The Division of Forestry agrees to provide detection and initial attack suppression services upon request, subject to available forces, on military lands. "No Entry Areas" are excluded. The request will be made by the Military Fire Chief or the Alaska Fire Service Military Fire Management Officer. All requested detection and suppression costs are reimbursable.

FIRE-NN029: The Gerstle River Test Site is not part of this withdrawal renewal action.

NN

Some explanation is needed that this area will not receive suppression activities. It may be appropriate to give this a "Restricted Area" category.

Page 3-73 Fire History. In 1998, lightning caused fire began north of Fort Greely and spread to Fort Greely West Training Area.

This is not true. The fire started on Fort Greely land in the West Training Area on May 20, 1998. The fire was reported to the BLM by Fort Greely Fire Department that evening. The BLM responded with a detection flight at 1400 the following day. The fire protection level was "modified": It burned on to State land and cost \$16 million to suppress.

Page 3-73, paragraph 3:

The statistics are misleading and the accuracy is questionable. The BLM stopped giving fire numbers to fires unless "they" took action. If the fire department put it out or it burned in "Hot Zones" no numbers were given.

More importantly in the fire history is how were fires suppressed and are those resources going to be available in the future?

Page 4-57 4.15 Fire Management, paragraph 3: Under the Preferred Alternative, the present management agreements and support service between U.S. Army Alaska and the Fire Service would continue.

The missing element of the past success of the initial attack on Fort Greely has been quick detection and a rapid initial attack response provided by the Fort Greely Fire Department. With the elimination of these facilities and capabilities, how will the BLM provide this critical element to be successful at catching fires? Does the BLM plan on having wildland fire engines prepositioned at Fort Greely? Who will provide detection?

Page 4-58, paragraph 2: The Preferred Alternative continues U.S. Army Alaska as the Land Manager for fire management.

Who is this person? Will someone be given this authority at Fort Greely to make decisions during the initial attack phase of a fire?

Page 4-58, paragraph 3: However, fire information for the withdrawn lands show that out of 95 incendiary device fires, only one has crossed onto State lands indicating that the probability of this occurrence is low.

This statement is misleading. The cause doesn't have anything to do with fires that could/did threaten State land.

FIRE-NN030: The correction has been made. The fire started on Fort Greely land, however the fire was reported to the Bureau of Land Management (BLM) at 0004 hours May 21. The detection flight was at 0953 hours and was delayed because it was the first aircraft available. A request was made for detection assistance from the Division of Forestry (DOF), but no aircraft was available.

FIRE-NN030

FIRE-NN031: If the military fire department put a fire out and did not report it to Bureau of Land Management, the agency would not have a record of it. Since 1987 (when the USARAK/BLM agreement went into effect), fires that have burned in Hot Zones have received a number. There is some indication that a few fires within the Yukon Training Area did not receive numbers. The Alaska Fire Service believes all fires at Fort Greely, including those in the Hot Zones, received numbers.

FIRE-NN031

The response for FIRE-NN026 addresses suppression and future resources. Again, the BLM has the responsibility. Operational details should be spelled out in other documents such as a Fire Management Plan.

FIRE-NN032: Operational details for fire suppression after the Base Realignment and Closure (BRAC) should be discussed in the BRAC Environmental Assessment for Fort Greely or in a Fire Management Plan.

FIRE-NN032

FIRE-NN033: The Annual Operating Agreement between Alaska Fire Service (AFS) and Division of Forestry states:

0 The Military Fire Chief at each location will operate as the land manager's representative for the military land on their base garrison/cantonment areas. BLM is responsible for supplying a land manager's representative for military lands outside of the garrison/cantonment areas. The BLM retains vegetative land management responsibility over all withdrawn lands and therefore the Preferred Alternative continues USARAK and BLM as land managers for fire protection. Fire Protection Status Boundary options (Figures 3.15.a and 3.15.b) are the decision of the land managers and not AFS. The AFS does provide recommendations for the boundaries.

FIRE-NN033

FIRE-NN034: Information from the fire data shows that fire suppression efforts on the withdrawal lands have been able to maintain most incendiary fires to the withdrawal land boundaries. Incendiary devices increase the risk for fires. Fires may move onto State land. Most of the Fire Protection Status Boundaries for the withdrawal lands have been coordinated with State Protection Boundaries as shown in Figures 3.15.a and 3.15.b.

FIRE-NN034

Any fire starting on military land which is allowed to burn unchecked could be a threat to State land. The Carla Lake Fire was a good example of how costly a military fire can be to the State, not only in suppression cost but loss of natural resources, private property, etc.

Page 4-59, paragraph 2: *Cumulative effects. The number of fires from incendiary devices will continue to be high on the Impact Area, resulting in various successional stage vegetation.*

This is a true statement. However, there is no reference to the use of simulator devices, blanks, and smoke canisters during maneuvers in the East Training Area during spring training exercises. These devices have caused several fires and are an immediate threat to the cantonment area and State and private land. Fort Greely Fire Department has provided the initial attack in the past. Who will provide this service now to protect these resources?

Page 4-59, paragraph 3: *No Action Alternative. Under the No Action Alternative, lands could eventually be returned to the State of Alaska. The Alaska Fire Service would no longer have primary responsibility for fire suppression on the withdrawn lands; primary responsibility would be with the State of Alaska, Department of Forestry.*

This land is BLM property. The State will probably not be interested in selecting land used for military training due to the hazardous material which may exist. Fire protection could become the responsibility of the Division of Forestry through agreement with BLM.

Page 4-59, paragraph 5: *Under the Alaska Fire Management Plan, the Alaska Fire Service would remain the first responder agency for the Fort Wainwright Yukon Training Area and the Department of Forestry would maintain the first responder for Fort Greely.*

At this time there is no agreement that would implement the protection responsibility as written. The BLM has initial attack responsibility.

In closing, this document has not adequately addressed how it will provide for the protection of State and private lands if threatened by a wildland fire. The continued use of Fort Greely as a training and maneuver area has not changed. Yet, the down sizing of several key elements, (i.e. Fort Greely Fire Department and radio station for emergency notification) has changed due to the base realignment. This document needs to address in detail how they will protect the State resources. This document repeatedly refers to the Department of Forestry. We are the Department of Natural Resources, Division of Forestry.

Cc: Jim Lewandoski

FIRE-NN035

FIRE-NN035: A statement has been added to Chapter 4.15 under the Cumulative Effects regarding the use of incendiary devices in the East Training Area. The Alaska Fire Service will provide services to protect resources on the withdrawal lands.

FIRE-NN036

FIRE-NN036: Changes have been made to Chapter 4.15 under the No Action Alternative, to state that if the land is not conveyed to the State, the Bureau of Land Management, Alaska Fire Service would retain responsibility.

FIRE-NN037

FIRE-NN037: If the State does not receive conveyance to the land, the BLM, AFS would retain responsibility. See Chapter 4.15 for necessary changes to the No Action Alternative.

OTH-NN042

OTH-NN042: Through the Reciprocal Fire Protection Agreement and the Annual Operating Agreement, the Division of Forestry has agreed to provide detection and initial attack suppression services upon request, and subject to available forces, for Fort Greely West and East Training Areas which lie within the Division of Forestry Protection Area. "No Entry Areas" are excluded. The request to the Division of Forestry will be made by the Military Fire Chief or the Alaska Fire Service Military Fire Management Officer.

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

COMMENT SHEET

DATE: Feb. 5th 99

COMMENTOR'S NAME: Mike Stredny

COMMENTOR'S ADDRESS: Mike Stredny
3121 River Bend Rd.
N. Pole, Alaska 99705

COMMENTOR REPRESENTING: SELF: ORGANIZATION: X

ORGANIZATION NAME: Alaska Trail Association

ADDRESS: P.O. Box 57010
N. Pole, Alaska 99705

COMMENTS: Lease needs to be set at 15 years instead
of the 50 yr lease. A perfect example is the Nike
missile site built on the Fort Wainwright Yukon
training area. It was submitted to Congress in 1956,
built in 1959 & decommissioned in 1978. That's
14 yrs. Don start to finish. In today's technology,
weapon systems are obsolete even quicker.

ALT-00070

RESPONSE TO COMMENT 00

ALT-00070: 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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Another point would be mandatory site clean-up. That Nike missile site still has not been decontaminated, 1970 to 1998 equal 28 yrs. Any future leases should have a guaranteed decontamination effort.

The DEIS fails to address the historic trails that go thru some of these lands, the RS-2477 trails. The military should be responsible for mapping these trails in a mandatory trail corridor of 100% clean-up upon the end of the lease.

A monitoring program to comply with Executive Order 13045 must be established on the Chena watershed, for unexploded ordnance. Also a monitoring program on that same Chena watershed to assess the amount of lost watershed vegetation concerning flood control as well as sedimentation in a salmon stream consistent with Corp of Engineers specifications. And yes, a complete restoration when the lease is up.

RETURN THIS COMMENT FORM TO:

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

Feb. 7th 98

OR

SUBMIT YOUR COMMENTS AND MAILING REQUESTS VIA THE INTERNET:
<http://www.cemml.colostate.edu/alaskaeis>

148.9 million decontaminate
Senate McCain - Ariz.

MIT-00024

MIT-00024: 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). Current decontamination efforts are described including an ordnance cleanup history by the Air Force (see Appendix 2.C).

CULT-00005

CULT-00005: Historic trails crossing withdrawn lands are discussed in the Integrated Cultural Resources Management Plan (Alaska State Historic Preservation Office, 1998). The plan includes general procedures to inventory and manage historic resources, which could include historic trails. Under the Preferred Alternative, the Integrated Cultural Resources Management Plan would be implemented. Under the No Action Alternative, this plan would not be implemented, and identification and management of trails would be the responsibility of either the Bureau of Land Management or the State. Otherwise, specifically with respect to RS-2477 trails which might exist on military lands, the Army has no plans to map or inventory such trails.

WATER-00016

WATER-00016: 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). Proposed mitigation in Chapter 4.13.2 states that surveys of waterways on the withdrawn lands should be conducted to assess damage to stream banks and associated vegetation, and contamination from ammunition used in the Impact Areas.

9.3 INDEX OF COMMENTS AND RESPONSES

An index of individual comments and responses grouped by topic code is presented below. 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.

Comment Code	Commentor	Page
ACC-A001	Morris	7
ACC-A002	Morris	7
ACC-A003	Morris	7
ACC-A004	Morris	9
ACC-C005	Sheehan	15
ACC-C006	Sheehan	17
ACC-G007	Backes	28
ACC-G008	Montoya	29
ACC-G009	Fate	31
ACC-J010	Giuchici	37
ACC-N011	McCombs	42
ACC-Q012	Barron	46
ACC-X013	Alaska Office of the Governor	72
ACC-Y014	Malcolm	73
ACC-Z015	Thomasson	75
ACC-AA016	U.S. Department of the Interior	80
ACC-AA017	U.S. Department of the Interior	82
ACC-AA018	U.S. Department of the Interior	91
ACC-AA019	U.S. Department of the Interior	91
ACC-AA020	U.S. Department of the Interior	97
ACC-AA021	U.S. Department of the Interior	98

Comment Code	Commentor	Page
ACC-AA022	U.S. Department of the Interior	98
ACC-II023	Fairbanks Area Alaska State Parks Citizen Advisory Board	117
ACC-II024	Fairbanks Area Alaska State Parks Citizen Advisory Board	117
ACC-II025	Fairbanks Area Alaska State Parks Citizen Advisory Board	117
ACC-KK026	City of Delta Junction	134
AIR-V001	Adams	65
AIR-AA002	U.S. Department of the Interior	93
AIR-AA003	U.S. Department of the Interior	93
AIR-KK004	City of Delta Junction	134
ALT-A001	East-Cole	5
ALT-A002	W. Hicks	10
ALT-B003	Good	12
ALT-B004	Good	12
ALT-E005	Pratt	22
ALT-E006	Pratt	22
ALT-G007	Storey	27
ALT-G008	Backes	27
ALT-G009	Backes	29
ALT-G010	Fate	31
ALT-K011	Boyce	38
ALT-L012	Karish	39
ALT-N013	McCombs	42
ALT-O014	Fields	43
ALT-O015	Fields	43
ALT-P016	Alaska Trappers Association	44
ALT-P017	Alaska Trappers Association	44
ALT-Q018	Barron	46
ALT-R019	Alaska Miners Association, Inc.	47
ALT-R020	Alaska Miners Association, Inc.	47
ALT-R021	Alaska Miners Association, Inc.	47

Comment Code	Commentor	Page
ALT-R022	Alaska Miners Association, Inc.	47
ALT-R023	Alaska Miners Association, Inc.	47
ALT-R024	Alaska Miners Association, Inc.	47
ALT-U025	Tileston	59
ALT-U026	Tileston	63
ALT-V027	Adams	67
ALT-V028	Adams	67
ALT-W029	W. Hicks	68
ALT-W030	W. Hicks	68
ALT-W031	W. Hicks	68
ALT-W032	W. Hicks	70
ALT-X033	Alaska Office of the Governor	71
ALT-X034	Alaska Office of the Governor	71
ALT-Y035	Malcolm	73
ALT-Y036	Malcolm	73
ALT-Z037	Thomasson	75
ALT-Z038	Thomasson	75
ALT-AA039	U.S. Department of the Interior	76
ALT-AA040	U.S. Department of the Interior	77
ALT-AA041	U.S. Department of the Interior	78
ALT-AA042	U.S. Department of the Interior	78
ALT-AA043	U.S. Department of the Interior	78
ALT-AA044	U.S. Department of the Interior	79
ALT-AA045	U.S. Department of the Interior	79
ALT-AA046	U.S. Department of the Interior	79
ALT-AA047	U.S. Department of the Interior	79
ALT-AA048	U.S. Department of the Interior	80
ALT-AA049	U.S. Department of the Interior	83
ALT-AA050	U.S. Department of the Interior	83
ALT-AA051	U.S. Department of the Interior	83

Comment Code	Commentor	Page
ALT-AA052	U.S. Department of the Interior	84
ALT-AA053	U.S. Department of the Interior	84
ALT-AA054	U.S. Department of the Interior	84
ALT-AA055	U.S. Department of the Interior	84
ALT-BB056	Northern Alaska Environmental Center	101
ALT-BB057	Northern Alaska Environmental Center	101
ALT-BB058	Northern Alaska Environmental Center	101
ALT-CC059	Wartes	103
ALT-DD060	J. Hicks	104
ALT-DD061	J. Hicks	106
ALT-DD062	J. Hicks	105
ALT-GG063	Miller	109
ALT-HH064	U.S. Environmental Protection Agency	111
ALT-II065	Fairbanks Area Alaska State Parks Citizen Advisory Board	116
ALT-II066	Fairbanks Area Alaska State Parks Citizen Advisory Board	117
ALT-JJ067	Northridge Exploration	131
ALT-KK068	City of Delta Junction	132
ALT-KK069	City of Delta Junction	135
ALT-OO070	Stredny	149
CULT-B001	Good	13
CULT-AA002	U.S. Department of the Interior	76
CULT-AA003	U.S. Department of the Interior	91
CULT-AA004	U.S. Department of the Interior	98
CULT-OO005	Stredny	150
FIRE-B001	Good	12
FIRE-C002	Sheehan	19
FIRE-Q003	Barron	46
FIRE-V004	Adams	65
FIRE-AA005	U.S. Department of the Interior	90
FIRE-AA006	U.S. Department of the Interior	90

Comment Code	Commentor	Page
FIRE-AA007	U.S. Department of the Interior	90
FIRE-AA008	U.S. Department of the Interior	91
FIRE-AA009	U.S. Department of the Interior	91
FIRE-AA010	U.S. Department of the Interior	91
FIRE-AA011	U.S. Department of the Interior	91
FIRE-AA012	U.S. Department of the Interior	93
FIRE-AA013	U.S. Department of the Interior	94
FIRE-AA014	U.S. Department of the Interior	94
FIRE-AA015	U.S. Department of the Interior	96
FIRE-AA016	U.S. Department of the Interior	97
FIRE-AA017	U.S. Department of the Interior	97
FIRE-AA018	U.S. Department of the Interior	97
FIRE-AA019	U.S. Department of the Interior	97
FIRE-AA020	U.S. Department of the Interior	97
FIRE-AA021	U.S. Department of the Interior	98
FIRE-AA022	U.S. Department of the Interior	98
FIRE-DD023	J. Hicks	104
FIRE-KK024	City of Delta Junction	135
FIRE-MM025	Lyle	139
FIRE-MM026	Lyle	144
FIRE-NN027	Delta Area Forestry	146
FIRE-NN028	Delta Area Forestry	146
FIRE-NN029	Delta Area Forestry	146
FIRE-NN030	Delta Area Forestry	147
FIRE-NN031	Delta Area Forestry	147
FIRE-NN032	Delta Area Forestry	147
FIRE-NN033	Delta Area Forestry	147
FIRE-NN034	Delta Area Forestry	147
FIRE-NN035	Delta Area Forestry	148
FIRE-NN036	Delta Area Forestry	148

Comment Code	Commentor	Page
FIRE-NN037	Delta Area Forestry	148
FISH-A001	East-Cole	6
FISH-D002	Parker	21
FISH-G003	Layne	26
FISH-H004	O'Neill	34
FISH-AA005	U.S. Department of the Interior	96
FISH-DD006	J. Hicks	105
FISH-LL007	McCaffrey	136
FOR-E001	Pratt	22
FOR-AA002	U.S. Department of the Interior	89
FOR-MM003	Lyle	145
GEOL-AA001	U.S. Department of the Interior	87
GEOL-AA002	U.S. Department of the Interior	87
GEOL-AA003	U.S. Department of the Interior	87
GEOL-AA004	U.S. Department of the Interior	87
GEOL-AA005	U.S. Department of the Interior	92
GEOL-AA006	U.S. Department of the Interior	92
GLAC-AA001	U.S. Department of the Interior	86
LAND-G001	Layne	25
LAND-V002	Adams	65
LAND-V003	Adams	66
LAND-AA004	U.S. Department of the Interior	80
LAND-AA005	U.S. Department of the Interior	82
LAND-AA006	U.S. Department of the Interior	85
LAND-AA007	U.S. Department of the Interior	85
LAND-AA008	U.S. Department of the Interior	86
LAND-AA009	U.S. Department of the Interior	86
LAND-AA010	U.S. Department of the Interior	86
LAND-AA011	U.S. Department of the Interior	86
LAND-AA012	U.S. Department of the Interior	92

Comment Code	Commentor	Page
LAND-AA013	U.S. Department of the Interior	93
LAND-HH014	U.S. Environmental Protection Agency	114
MIN-B001	Good	13
MIN-E002	Pratt	22
MIN-R003	Alaska Miners Association, Inc.	47
MIN-R004	Alaska Miners Association, Inc.	48
MIN-R005	Alaska Miners Association, Inc.	48
MIN-R021	Alaska Miners Association, Inc.	52
MIN-R022	Alaska Miners Association, Inc.	52
MIN-R023	Alaska Miners Association, Inc.	52
MIN-R024	Alaska Miners Association, Inc.	53
MIN-R025	Alaska Miners Association, Inc.	53
MIN-R026	Alaska Miners Association, Inc.	53
MIN-U006	Tileston	59
MIN-U007	Tileston	63
MIN-U008	Tileston	63
MIN-U009	Tileston	63
MIN-W010	W. Hicks	68
MIN-W011	W. Hicks	70
MIN-AA012	U.S. Department of the Interior	87
MIN-AA013	U.S. Department of the Interior	88
MIN-AA014	U.S. Department of the Interior	88
MIN-AA015	U.S. Department of the Interior	88
MIN-AA016	U.S. Department of the Interior	88
MIN-AA017	U.S. Department of the Interior	91
MIN-AA018	U.S. Department of the Interior	92
MIN-AA019	U.S. Department of the Interior	93
MIN-DD020	J. Hicks	105
MIN-JJ027	Northridge Exploration	131
MIN-JJ028	Northridge Exploration	131

Comment Code	Commentor	Page
MIN-KK029	City of Delta Junction	135
MIT-C001	Sheehan	17
MIT-C002	Sheehan	19
MIT-G003	Backes	28
MIT-V004	Adams	64
MIT-V005	Adams	64
MIT-V006	Adams	65
MIT-V007	Adams	66
MIT-V008	Adams	67
MIT-W009	W. Hicks	68
MIT-W010	W. Hicks	70
MIT-AA011	U.S. Department of the Interior	79
MIT-AA012	U.S. Department of the Interior	81
MIT-AA013	U.S. Department of the Interior	84
MIT-BB014	Northern Alaska Environmental Center	100
MIT-BB015	Northern Alaska Environmental Center	100
MIT-BB016	Northern Alaska Environmental Center	101
MIT-GG017	Miller	109
MIT-HH018	U.S. Environmental Protection Agency	113
MIT-HH019	U.S. Environmental Protection Agency	114
MIT-KK020	City of Delta Junction	133
MIT-MM021	Lyle	142
MIT-MM022	Lyle	143
MIT-MM023	Lyle	145
MIT-OO024	Stredny	150
NOISE-B001	Good	12
NOISE-KK002	City of Delta Junction	135
OTH-B001	Good	13
OTH-C002	Sheehan	15
OTH-C003	Sheehan	18

Comment Code	Commentor	Page
OTH-C004	Sheehan	20
OTH-C005	Sheehan	20
OTH-G006	Balko	30
OTH-P007	Alaska Trappers Association	44
OTH-Q008	Barron	46
OTH-V009	Adams	66
OTH-AA010	U.S. Department of the Interior	76
OTH-AA011	U.S. Department of the Interior	76
OTH-AA012	U.S. Department of the Interior	76
OTH-AA013	U.S. Department of the Interior	78
OTH-AA014	U.S. Department of the Interior	78
OTH-AA015	U.S. Department of the Interior	78
OTH-AA016	U.S. Department of the Interior	81
OTH-AA017	U.S. Department of the Interior	81
OTH-AA018	U.S. Department of the Interior	81
OTH-AA019	U.S. Department of the Interior	81
OTH-AA020	U.S. Department of the Interior	81
OTH-AA021	U.S. Department of the Interior	81
OTH-AA022	U.S. Department of the Interior	81
OTH-AA023	U.S. Department of the Interior	82
OTH-AA024	U.S. Department of the Interior	82
OTH-AA025	U.S. Department of the Interior	83
OTH-AA026	U.S. Department of the Interior	83
OTH-AA027	U.S. Department of the Interior	93
OTH-AA028	U.S. Department of the Interior	95
OTH-AA029	U.S. Department of the Interior	99
OTH-DD030	J. Hicks	104
OTH-DD031	J. Hicks	105
OTH-EE032	Bealer	107
OTH-EE033	Bealer	107

Comment Code	Commentor	Page
OTH-GG034	Miller	108
OTH-HH035	U.S. Environmental Protection Agency	112
OTH-HH036	U.S. Environmental Protection Agency	113
OTH-MM037	Lyle	138
OTH-MM038	Lyle	138
OTH-MM039	Lyle	142
OTH-MM040	Lyle	144
OTH-MM041	Lyle	145
OTH-NN042	Delta Area Forestry	148
POL-A001	East-Cole	6
POL-A002	East-Cole	6
POL-A003	East-Cole	6
POL-G004	Layne	26
POL-G005	Layne	27
POL-G006	Balko	30
POL-M007	Miller	40
POL-V008	Adams	65
POL-V009	Adams	67
POL-AA010	U.S. Department of the Interior	76
POL-AA011	U.S. Department of the Interior	84
POL-BB012	Northern Alaska Environmental Center	100
POL-GG013	Miller	108
POL-HH014	U.S. Environmental Protection Agency	111
POL-HH015	U.S. Environmental Protection Agency	112
POL-II016	Fairbanks Area Alaska State Parks Citizen Advisory Board	116
POL-KK017	City of Delta Junction	133
POL-KK018	City of Delta Junction	133
POL-MM019	Lyle	139
POL-MM020	Lyle	140
REC-B001	Good	13

Comment Code	Commentor	Page
REC-E002	Pratt	22
REC-P003	Alaska Trappers Association	45
REC-P004	Alaska Trappers Association	45
REC-Y005	Malcolm	74
REC-AA006	U.S. Department of the Interior	95
REC-AA007	U.S. Department of the Interior	95
REC-AA008	U.S. Department of the Interior	98
REC-AA009	U.S. Department of the Interior	98
REC-MM010	Lyle	145
SOC-A001	East-Cole	6
SOC-A002	W. Hicks	10
SOC-A003	W. Hicks	10
SOC-B004	Good	12
SOC-B005	Good	13
SOC-B006	Good	13
SOC-B007	Good	14
SOC-T008	O'Neill	56
SOC-T009	O'Neill	57
SOC-W010	W. Hicks	68
SOC-W011	W. Hicks	70
SOC-AA012	U.S. Department of the Interior	98
SOC-AA013	U.S. Department of the Interior	98
SOC-BB014	Northern Alaska Environmental Center	101
SOC-DD015	J. Hicks	106
SOC-EE016	Bealer	107
SOC-KK017	City of Delta Junction	132
SOC-MM018	Lyle	139
SOC-MM019	Lyle	141
SOC-MM020	Lyle	141
SOIL-A001	Morris	8

Comment Code	Commentor	Page
SOIL-V002	Adams	65
SOIL-V003	Adams	66
SOIL-V004	Adams	66
SOIL-AA005	U.S. Department of the Interior	93
SOIL-AA006	U.S. Department of the Interior	93
SOIL-AA007	U.S. Department of the Interior	94
SOIL-AA008	U.S. Department of the Interior	94
SOIL-MM009	Lyle	144
SUB-B001	Good	12
SUB-B002	Good	13
SUB-B003	Good	14
SUB-B004	Good	14
SUB-I005	Schlotfeldt	36
SUB-AA006	U.S. Department of the Interior	77
SUB-AA007	U.S. Department of the Interior	91
SUB-AA008	U.S. Department of the Interior	91
SUB-AA009	U.S. Department of the Interior	92
SUB-AA010	U.S. Department of the Interior	99
SUB-AA011	U.S. Department of the Interior	99
SUB-AA012	U.S. Department of the Interior	99
SUB-AA013	U.S. Department of the Interior	99
SUB-MM014	Lyle	145
TES-AA001	U.S. Department of the Interior	89
USE-A001	East-Cole	6
USE-A002	W. Hicks	10
USE-B003	Good	13
USE-B004	Good	13
USE-C005	Sheehan	16
USE-C006	Sheehan	18
USE-C007	Sheehan	18

Comment Code	Commentor	Page
USE-C008	Sheehan	18
USE-C009	Sheehan	19
USE-C010	Sheehan	19
USE-C011	Sheehan	19
USE-C012	Sheehan	20
USE-F013	O'Neill	24
USE-F014	O'Neill	24
USE-H015	O'Neill	33
USE-H016	O'Neill	33
USE-H017	O'Neill	33
USE-H018	O'Neill	33
USE-H019	O'Neill	34
USE-H020	O'Neill	34
USE-H021	O'Neill	34
USE-H022	O'Neill	34
USE-H023	O'Neill	34
USE-H024	O'Neill	34
USE-H025	O'Neill	34
USE-H026	O'Neill	34
USE-H027	O'Neill	34
USE-H028	O'Neill	34
USE-H029	O'Neill	34
USE-S030	Alaska Department of Fish and Game	54
USE-T031	O'Neill	55
USE-V032	Adams	64
USE-V033	Adams	64
USE-V034	Adams	67
USE-Y035	Malcolm	73
USE-Y036	Malcolm	73
USE-Y037	Malcolm	73

Comment Code	Commentor	Page
USE-Z038	Thomasson	75
USE-DD039	J. Hicks	104
USE-GG040	Miller	108
USE-GG041	Miller	109
USE-II042	Fairbanks Area Alaska State Parks Citizen Advisory Board	116
USE-II043	Fairbanks Area Alaska State Parks Citizen Advisory Board	116
USE-KK044	City of Delta Junction	133
USE-MM045	Lyle	138
USE-MM046	Lyle	140
USE-MM047	Lyle	140
USE-MM048	Lyle	141
USE-MM049	Lyle	143
USE-MM050	Lyle	144
USE-MM051	Lyle	145
VEG-AA001	U.S. Department of the Interior	85
VEG-AA002	U.S. Department of the Interior	89
VEG-AA003	U.S. Department of the Interior	94
VEG-AA004	U.S. Department of the Interior	95
WATER-A001	Morris	8
WATER-D002	Parker	21
WATER-G003	Balko	30
WATER-Y004	Malcolm	73
WATER-AA005	U.S. Department of the Interior	76
WATER-AA006	U.S. Department of the Interior	81
WATER-AA007	U.S. Department of the Interior	88
WATER-AA008	U.S. Department of the Interior	88
WATER-AA009	U.S. Department of the Interior	88
WATER-AA010	U.S. Department of the Interior	89
WATER-AA011	U.S. Department of the Interior	89
WATER-AA012	U.S. Department of the Interior	94

Comment Code	Commentor	Page
WATER-DD013	J. Hicks	105
WATER-KK014	City of Delta Junction	134
WATER-LL015	McCaffrey	136
WATER-OO016	Stredny	150
WET-AA001	U.S. Department of the Interior	88
WET-AA002	U.S. Department of the Interior	95
WET-DD003	J. Hicks	105
WILD-S001	Alaska Department of Fish and Game	54
WILD-S002	Alaska Department of Fish and Game	54
WILD-S003	Alaska Department of Fish and Game	54
WILD-AA004	U.S. Department of the Interior	89
WILD-AA005	U.S. Department of the Interior	90
WILD-AA006	U.S. Department of the Interior	90
WILD-AA007	U.S. Department of the Interior	90
WILD-AA008	U.S. Department of the Interior	95
WILD-AA009	U.S. Department of the Interior	95
WILD-AA010	U.S. Department of the Interior	95
WILD-AA011	U.S. Department of the Interior	95
WILD-AA012	U.S. Department of the Interior	96
WILD-AA013	U.S. Department of the Interior	96
WILD-AA014	U.S. Department of the Interior	96
WILD-FF015	This code is not used in the LEIS.	
WILD-FF016	This code is not used in the LEIS.	
WILD-FF017	This code is not used in the LEIS.	
WILD-FF018	This code is not used in the LEIS.	
WILD-FF019	This code is not used in the LEIS.	
WILD-KK020	City of Delta Junction	133
WILD-MM021	Lyle	145