

**CHAPTER 9
COMMENTS AND RESPONSES**

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COMMENTS AND RESPONSES

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

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

9.1 SUMMARY OF PUBLIC COMMENT PROCESS

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

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

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

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

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

9.2 COMMENTS ON THE DRAFT LEIS AND ARMY RESPONSES

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

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

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

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

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

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

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

HEARING PROCEEDINGS HELD ON
Tuesday, January 5, 1999

Volume 1 of 1
Pages 1 to 11, inclusive

Reported by:
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Heartland Court Reporters

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P R O C E E D I N G S

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

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

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

ALT-A001

RESPONSES TO COMMENT A

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

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

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

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

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

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

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

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

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

USE-A001

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

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

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

SOC-A001**POL-A001**

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

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

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

FISH-A001

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

Proposed mitigation is outlined in Chapter 4.23.

POL-A002

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

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

POL-A003

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

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

Sincerely, Jennie East-Cole.
(Statement concluded at 3:50 p.m.,
January 5, 1998.)

(The following is the statement given by
Mr. Jack Morris at 6:05 p.m.,
January 5, 1999.)

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

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

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

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

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

The second item that I would like to talk on is

ACC-A001

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

ACC-A002

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

ACC-A003

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

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

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

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

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

WATER-A001

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

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

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

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

SOIL-A001

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encampment.

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

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

I think that's it.

(Off record, then back on record.)

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

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

ACC-A004

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

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

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

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

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

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

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

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

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

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

SOC-A002

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

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

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

ALT-A002

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

USE-A002

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

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

SOC-A003

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

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

That's about all I have.

(Statement concluded at 6:25 p.m.,
January 5, 1999.)

(No further statements were given on
January 5, 1999.)

REPORTER'S CERTIFICATE

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

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

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

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this ____ day of _____, 1999.

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

23 My Commission Expires: February 15, 2002

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B

Fort Greely Lands Withdrawal Renewal

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

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

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

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

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

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

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

RESPONSES TO COMMENT B

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

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

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

ALT-B003

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

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

SOC-B004

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

ALT-B004

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

SUB-B001

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.

NOISE-B001

Mitigation measures are listed in Chapter 4.22 and Chapter 4.23.

FIRE-B001

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

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

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

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

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

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

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

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

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

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

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

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

USE-B003

OTH-B001

SOC-B005

USE-B004

MIN-B001

CULT-B001

SOC-B006

SUB-B002

REC-B001

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

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

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

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

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

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

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

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

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

B

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

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

SUB-B003

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

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

SUB-B004

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

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

SOC-B007

SOC-B007: Noted.

Nathaniel M. Good - Not Good
Nathaniel M. Good
BOVSC7 Delta Jct 99737

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

Delta Fish & Game Advisory Committee

Eastern Interior Federal Subsistence Council

Delta Junction City Council

Gerstle River Test Site Expansion Area RAB

C

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

5 January 1999

To Whom it May Concern,

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

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

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

RESPONSES TO COMMENT C

OTH-C002

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

ACC-C005

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

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9-16

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

ACC-C005
cont.

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

USE-C005

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

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factual, and in a letter from the Community Coalition.

5. Except for a USAF decontamination plan for the two impact areas (Delta Creek and Oklawaha)^{that} they plan to use, the LEIS does not address decontamination of the remaining impact areas (Lakes, Mississippi, or Washington).⁷ As input to a PLO that may be in effect for 50 years (almost as long as FGA has been in existence), the LEIS should address proper records keeping and unexploded munitions disposal. In my opinion, the military should declare that a total decontamination of previously fired munitions in the Delta River and Delta Creek Impact Areas is not feasible.

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

MIT-C001

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

ACC-C006

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

3

C

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

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

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

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

USE-C006

USE-C007

OTH-C003

USE-C008

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

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

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

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

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

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

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

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

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

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

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

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

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

MIT-C002

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

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

USE-C009

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

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

USE-C010

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

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

USE-C011

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

g. Trainers must consider the potential fire hazard and coordinate with State Fire Managers in the local community. When necessary, potential fire hazard areas should not be fired upon. Impact areas must be reduced in size and scope so that fire fighting can be accomplished on the ground when necessary. ^{IN SECT 41} With proper range control planning & coordination, impact areas can be used without causing wild fires and the destruction of flora and fauna.

FIRE-C002

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

C

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

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

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

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

Signature

INSERT # 1

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

REFERENCE INDEX

ITEM		PAGE(S)
NR		
1	ES.10, 4-16+12, 4.60+61	SCP 58-72
2	2.17-20	
3	SCP. 48	
4	2.29 2.6	
5	2.11-25	
6	SCP 57-59	
7	2.25-26	
8	SCP. 68-72	4.60-61
9	SCP 1-105	4.60-61
10	4.60-61	
11	2.39	
12	2D.70	

OTH-C004

OTH-C005

USE-C012

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

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

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

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

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

D

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

COMMENT SHEET

DATE: 1/5/99

COMMENTOR'S NAME: Frosty Parker

COMMENTOR'S ADDRESS: P.O. Box 605
Delta Tel. AK.

COMMENTOR REPRESENTING: SELF: ORGANIZATION: X

ORGANIZATION NAME: ADF&G - Sport Fish Division

ADDRESS: Same as ABOVE

COMMENTS: RE: ICE BRIDGES

Inquire about types of subsurface studies if any that affect groundwater table, I was directed to Cold weather test section people at Fort Rich. There is a need to know what disturbance if any occurs ~~with~~ below surface of ice, if a ice sill is formed ^{if so} ~~and~~ what impact that may cause ~~also substantiated~~ ~~in lands~~ I wanted to encourage cooperation between Army & ADF&G to maintain/enhance fishing opportunities on military lands.

RESPONSES TO COMMENT D

WATER-D002

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

FISH-D002

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

Army seeks 50-year extension of land withdrawals

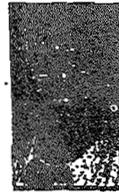
Military land withdrawals covering 871,537 acres of Interior Alaska expire in less than three years, and the U.S. Army is quietly asking Congress to renew them for 50 years, three times longer than the current withdrawal terms.

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

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

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

Fred Pratt



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

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

A public hearing is scheduled on the EIS in Fairbanks Jan. 5, 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.

MIN-E002

REC-E002

FOR-E001

ALT-E005

ALT-E006

RESPONSES TO COMMENT E

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

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

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

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

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

Alaska: the great bombing range

Military proposal needs closer look

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

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

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

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

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

Dan O'Neill



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

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

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

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

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

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

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

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

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

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

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

RESPONSES TO COMMENT F

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

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

USE-F013

USE-F014

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

Proceedings Held at
The Carlson Center
Pioneer Room
Fairbanks, Alaska

HEARING PROCEEDINGS HELD ON
Wednesday, January 6, 1999

Volume 1 of 1
Pages 1 to 15, inclusive

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

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P R O C E E D I N G S

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

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

And it's our concern that the activities that

RESPONSES TO COMMENT G

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

LAND-G001

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

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

The reason that I say that we believe that we

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

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

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

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

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

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

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

POL-G004

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

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

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

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

FISH-G003

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

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

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

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

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

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

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

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

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

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

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

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

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FISH-G003
cont.

POL-G005

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

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

ALT-G007

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

ALT-G008

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

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

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

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

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

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

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

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

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

MIT-G003

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

ACC-G007

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

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

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

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

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

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

ALT-G009

I don't think I have anything else to say.
THE REPORTER: Thank you very much.
(Statement concluded at 4:28 p.m.,
January 6, 1999.)
(The following is the statement given by
Mr. Andy Montoya at 4:36 p.m.,
January 6, 1999.)

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

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

ACC-G008

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

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

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

I'm pretty much done, I believe. I don't like to see what they are doing to our playground.
(Statement concluded at 4:38 p.m.,

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January 6, 1999.)

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

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

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

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

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

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

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

(Off record, then back on record.)

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

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

WATER-G003

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

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

POL-G006

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

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

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

OTH-G006

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

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

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

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

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

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

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

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

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

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

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

ALT-G010

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

ACC-G009

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

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

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entire lake.

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

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

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

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

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

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

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

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

(Statement concluded at 7:47 p.m.,
January 6, 1999.)

(No further statements were given on
January 6, 1999.)

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REPORTER'S CERTIFICATE

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

That I am a Registered Merit Reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing proceedings, the various statements, taken January 6, 1999, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true and correct record of said proceedings taken on the date and time indicated therein;

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

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this ____ day of _____, 1999.

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

My Commission Expires: February 15, 2002

HEARTLAND COURT REPORTERS 907-452-6727

H

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

January 6, 1999

TO WHOM IT MAY CONCERN:

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

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

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

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

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

RESPONSES TO COMMENT H

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

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

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

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

USE-H015

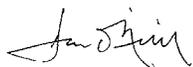
USE-H016

USE-H017

USE-H018

H

- you can lase and blind animals and blind people if it's not being done right and you can do it at tremendous distances"? (LEIS p. SCP-84)
5. Is it true as Sheehan says that the Ft Wainwright Yukon Training Area lacks "the terrain required by regulation to keep fired munitions and laser beams within prescribed impact areas, boundaries and on post"? (LEIS p. SCP-45)
 6. Is it true that the military is, in effect, expanding the bombing areas because it has labeled The Lakes area as a bombing area though Sheehan says "It is not now and never has been a bombing area...I drew those boundaries. I know what's supposed to be done there"? (LEIS p. SCP-86)
 7. Is the military's record keeping of bombing activities so lax that it can be characterized as, in Sheehan's words, "continued, uncontrolled contamination"? (LEIS p. SCP-58)
 8. Is it true as Sheehan says that "there are more duds in the Delta River than there are in Oklahoma Range. And I'm telling you that in all of the 60's and early 70's, the Air Force used Oklahoma as much as they are using it right now...and they didn't pick up the duds before they left"? (LEIS p. SCP-86)
 9. Does the military intentionally drop bombs right in the water of the Delta River? Does it also drop bombs right in Delta Creek? Does the military realize that its own LEIS defines these explosive residues—not to mention the more-than-residual compounds found in duds—as a pollutant that can leave the bombing area via watercourses? Does it realize that *the most important chum spawning grounds in the Tanana watershed is around the mouths of these two streams?*
 10. Is it true, as I understand Mr. Sheehan to say, that the military issued bogus clean-up documents: "This dud picking up business started about '82. Before that, they used to send statements, certificates that said there were no duds or all duds were cleaned up"? Does it also drop bombs right in Little Delta River? (LEIS p. SCP-86)
 11. How many duds of what description fall into these various impact areas annually? Does the military keep records of each bomb, rocket or missile that does not explode? If not why not?
 12. If it does not keep these records, and if it refuses to do so, can it say what percentage of each type of ordnance is statistically predicted to be a dud based on a reliability ratio for each type of ordnance? If not, why not?
 13. The military claims that, on average, one-fifth of the impact areas are "cleared each year of live ordnance." On what basis is the claim made that the ranges are "cleared of live ordnance"? How many duds of what type are actually collected each year? How does this number compare with the actual or predicted number of duds? Isn't it true that as Sheehan says, "you can never clean up the Delta River, which is one of the big impact areas, and you can never clean up the Little Delta Creek"? (LEIS p. SCP-24)
 14. With respect to unexploded bombs and rockets, what are the chances that the military will ever tell the public how seriously its activities are likely to contaminate the public's land? And isn't that what this environmental impact statement is supposed to do?



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

USE-H019

USE-H020

USE-H021

USE-H022

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

USE-H023

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

FISH-H004

USE-H024

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

USE-H025

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

USE-H026

USE-H027

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

USE-H028

USE-H029

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

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

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

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

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

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

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

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

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

COMMENT SHEET

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

COMMENTOR'S ADDRESS: Box 71752
Fairbanks AK 99707

COMMENTOR REPRESENTING: SELF: ORGANIZATION: _____

ORGANIZATION
NAME: _____

ADDRESS: _____

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

SUB-I005

RESPONSES TO COMMENT I

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

J

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

COMMENT SHEET

DATE: 1-6-99

COMMENTOR'S NAME: John Minchici

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

COMMENTOR REPRESENTING: SELF: ORGANIZATION: X

ORGANIZATION NAME: Salcha River Property Owners Assoc.

ADDRESS: 60 Hall St. FBKS, AK 99701

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

ACC-J010

RESPONSES TO COMMENT J

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

K

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

COMMENT SHEET

DATE: 1/6/99
COMMENTOR'S NAME: TODD BOYCE

COMMENTOR'S ADDRESS: 3174 JUDY LANE
NORTH POLE, AK 99705

COMMENTOR REPRESENTING: SELF: ORGANIZATION: _____

ORGANIZATION
NAME: _____

ADDRESS: _____

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

ALT-KO11

RESPONSES TO COMMENT K

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

L

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

COMMENT SHEET

DATE: 6 JAN 99

COMMENTOR'S NAME: JOHN E KARISH

COMMENTOR'S ADDRESS: P.O. Box 50628

NORTH POLE, AK 99705

COMMENTOR REPRESENTING: SELF: [X] ORGANIZATION:

ORGANIZATION NAME:

ADDRESS:

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

[Handwritten signature]

RESPONSES TO COMMENT L

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

ALASKA ARMY LANDS WITHDRAWAL
PUBLIC SCOPING MEETING
OPEN HOUSE

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

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

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

MIDNIGHT SUN COURT REPORTERS (907) 258-7100

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P R O C E E D I N G S

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

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

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

RESPONSES TO COMMENT M

POL-M007

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

G

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

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

MIDNIGHT SUN COURT REPORTERS (907) 258-7100

3

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

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

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CERTIFICATE

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

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

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

DEIRDRE J.F. RADCLIFFE

Notary Public for Alaska

My Commission Expires: 5-19-02

N

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

COMMENT SHEET

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

ADDRESS: _____

COMMENTS: _____

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

ALT-N013

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

ACC-N011

RESPONSES TO COMMENT N

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

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

O

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

COMMENT SHEET

DATE: 1/11/99

COMMENTOR'S NAME: John Fields

COMMENTOR'S ADDRESS: 2050 Resolution Road Fairbanks Alaska 99712

COMMENTOR REPRESENTING: SELF: X ORGANIZATION:

ORGANIZATION NAME:

ADDRESS:

COMMENTS: I feel that 50 year is an excessive time frame for removal. The areas should be reduced & the lands should be opened up for resource development on one surrendered lands. The Ft Greedy area should be turned over to the state of Alaska for disposal to the general public.

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

RESPONSES TO COMMENT O

ALT-0014

ALT-0014: Noted. The Army's selection of a 50-year renewal period is based on the need for substantial land mass to support training of soldiers in Arctic and Subarctic environments which will continue in the future to be critical to national defense preparedness. A credible operational military planning horizon is limited by withdrawal renewals every 10 to 15 years. Moreover, the resource commitment, both dollars and personnel, required for renewal every 10 to 15 years places a substantial burden on the Army. Considering the large costs to prepare this LEIS to continue existing operations, U.S. Army Alaska is proposing to lengthen the withdrawal period and utilize resources to protect resource values and implement natural resource management measures.

ALT-0015

ALT-0015: Army and Air Force needs require renewal of the existing withdrawals in their entirety. Please see Chapter 2.3 for a discussion of the alternatives eliminated from consideration in this withdrawal renewal action, which includes the reasons for their elimination.

P

ALASKA TRAPPERS ASSOCIATION

P.O. Box 82177
Fairbanks, Alaska 99708

January 14, 1999

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

Re: Draft Legislative EIS - Alaska Army Lands Withdrawal Renewal

Dear Ms. Herdrich:

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

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

1. We were very disappointed to find out the meeting in Fairbanks on January 6 that was widely billed as a public hearing, was actually nothing more than a public relations exercise by the military and your organization. We often deal with bureaucracies pushing unpopular activities and plans, so we are aware that agency personnel are trained to use the "open house tactic" to deflect criticism. But there are times when public hearings are appropriate. When your monitor at the doorway encouraged us to sign in for the "public hearing," we believe you should actually hold a public hearing and take testimony. **OTH-P007**
2. It is unrealistic to summarily dismiss other obviously workable and publicly popular (though perhaps not as palatable to the military) alternatives. To suggest that the only options are no withdrawal or withdrawal for 50 years is disingenuous at best. A more reasonable approach is to discuss other, shorter time frames. We suggest that a 10 year withdrawal is far more appropriate considering the dynamics of military training requirements and the general land management situation. **ALT-P016**
3. It is also obvious that the military should consider relinquishing the many areas it does not actually use. The tactic of claiming that the areas are all too contaminated and it is impossible to clean them up or certify them as clean, is just too transparent to be used anymore. **ALT-P017**
4. Our reluctance to endorse a withdrawal of a longer duration is based on our extensive

RESPONSES TO COMMENT P

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

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

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

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

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

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

P

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

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

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

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

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

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

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

Thank you for the opportunity to comment.

Very truly yours,



Pete Buist
President

REC-P003

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

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

REC-P004

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

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

Q

Alaska Army Land Withdrawal Comment/Concerns Submittals

Monday, 25 January 1999

RESPONSES TO COMMENT Q**ALT-Q018:** Noted. Thank you for your comments.

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

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

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

Name: Bill Barron**Organization:****Address:** Box 59

Delta Junction, AK 99737

Comment: My family and I are opposed to any lease extension for the Fort Greely West / Yukon Training Area.**ALT-Q018**

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

FIRE-Q003

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

ACC-Q012

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

OTH-Q008

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

Thanks



R

ALASKA MINERS ASSOCIATION, INC.

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

January 23, 1999

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

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

Dear Ms. Hirter,

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

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

Length of the Proposed Withdrawal

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

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

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

RESPONSES TO COMMENT R

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

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

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

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

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

ALT-R019

ALT-R020

ALT-R021

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

Minerals Alternative

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

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

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

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

ALT-R022 **ALT-R022:** Noted. See previous two responses.

ALT-R023 **ALT-R023:** Noted.

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

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

ALT-R024 The analysis of the No Action Alternative describes potential impacts if Congress does not grant the withdrawal renewals. The discussion is not provided to support the withdrawal renewals, but to provide a comparison of potential impacts under each alternative.

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Federal Legislation to Extend the Existing Military Withdrawal

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

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

Mineral Information

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

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

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

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

**ALT-R024
cont.**

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

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

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

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

**MIN-R005
cont.**

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

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

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

Conclusion

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

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

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

Sincerely,



Steven C. Borell, P.E.
Executive Director

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

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



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ALASKA MINERS ASSOCIATION, INC.

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February 5, 1999

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

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

Dear Ms Herdrich,

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

Past Army Planning Documents and Promises

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

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

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

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

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

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

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

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

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

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

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

Analysis of Mineral Potential

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

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

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

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

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

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

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

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

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

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

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

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

MIN-R021

MIN-R022

MIN-R023

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

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

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

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

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

Sincerely,



Steven C. Borell, P.E.
Executive Director

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

MIN-R024

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

MIN-R025

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

MIN-R026

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

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

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

T
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January 26, 1999

Ms. Cindy Herdrich
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Colorado State University
Fort Collins, CO 80523

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

Recordkeeping

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

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

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

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

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

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

RESPONSES TO COMMENT T

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

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

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

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

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

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

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

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

Socioeconomics

Fires

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

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

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

100 Mile Creek Fire

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

USE-T031 cont.

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

Loss of Wildlife Habitat

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

Traplines, Recreational Use, and Tourism

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

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

SOC-T008

Timber

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

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

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME
DIVISION OF WILDLIFE CONSERVATION

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January 25, 1999

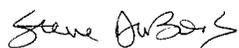
Ms. Cindy Herdrich
Center for Ecological Management of Military Lands
Vocational Education Building
Colorado State University
Fort Collins, CO 80523

Dear Ms. Herdrich:

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

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

Sincerely,



Steve DuBois
Wildlife Biologist

RESPONSES TO COMMENTS

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

WILD-S001

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

USE-S030

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

WILD-S002

WILD-S003

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

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

Carla Lake Fire

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

Hajdukovich Fire

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

Charley River Fire

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

Crime

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

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

Sincerely,



SOC-T009 SOC-T008 and T009 cont.:

Crime

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

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Jules V. Tileston
4780 Cambridge Way
Anchorage, AK 99503

January 28, 1999

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

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

Dear Ms. Hirter:

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

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

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

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

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

Withdrawal Time Frame and State Entitlements

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

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

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

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

Consideration of Mineral Resources

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

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

RESPONSES TO COMMENT U

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

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

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

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

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

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

ALT-U025

MIN-U006

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

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

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

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

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

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

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

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

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

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

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

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

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

MIN-U006
cont.

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

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

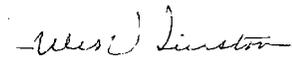
Summary

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

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

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

Sincerely ,



Jules V. Tileston

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

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Jules V. Tileston
4780 Cambridge Way
Anchorage, AK 99503

January 29, 1999

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

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

Dear Ms Hirter,

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

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

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

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

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

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

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

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

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

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

Sincerely,



Jules V. Tileston

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

MIN-U007

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

MIN-U008

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

ALT-U026

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

MIN-U009

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

1-30-99

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Ms. Cindy Herdlich
Center for Ecological Management of Military Lands
Colorado State University,
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U.S. Army Alaska Lands Withdrawal Renewal
Environmental Impact Statement

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

I represent myself, my comments follow:

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

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

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

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

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

USE-V032

RESPONSES TO COMMENT V

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

USE-V033

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

MIT-V004

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

MIT-V005

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

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

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

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

MIT-V006

MIT-V006: See previous page.

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

POL-V008

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

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

SOIL-V002

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

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

FIRE-V004

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

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

AIR-V001

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

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

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

LAND-V002

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

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

LAND-V003

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

11. The LEIS states (4.6) "The environmental standards against which off-road vehicle disturbances and the extent of munitions damage are measured have not yet been adequately defined for the Fort Wainwright Yukon Training Area and Fort Greely." It goes on to say that a general rating scheme was presented in 1974 - that was 22 years ago! Has there been no effort since then to assess this issue?

This is another area that seems to have been "blown off" by the Military and those who developed the LEIS. Is the end result to be that in 50 years the same 1974 scheme will rule the day? It is further stated that, "The majority of military activities conducted on Fort Wainwright Yukon Training Area involve off-road maneuvering, which accounts for the majority of soil damage on the training areas. Who is to be accountable, and when will this ever happen, given the cavalier approach to this and many other issues in the LEIS?"

SOIL-V003

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

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

SOIL-V004

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

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

MIT-V007

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

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

OTH-V009

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,


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

CC: Senator Stevens
Senator Murkowski
Representative Young

POL-V009

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

MIT-V008

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

USE-V034

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

ALT-V027

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

ALT-V028

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

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

9-67

W

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

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

February 3, 1999

Dear Ms. Herdrich,

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

Concerns:

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

Suggestions for solutions:

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

RESPONSES TO COMMENT W

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

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

ALT-W029

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

MIT-W009

MIN-W010

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

SOC-W010

ALT-W030

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

ALT-W031

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

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

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

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

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

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

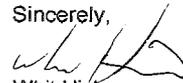
W

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

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

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

Sincerely,



Whit Hicks

MIT-W010

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

MIN-W011

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

SOC-W011

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

ALT-W032

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

X

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

<input checked="" type="checkbox"/> SOUTH-CENTRAL REGIONAL OFFICE 3601 "C" STREET, SUITE 370 ANCHORAGE, ALASKA 99503-5930 PH: (907) 269-7470/FAX: (907) 581-6134	<input type="checkbox"/> CENTRAL OFFICE P.O. BOX 110030 JUNEAU, ALASKA 99811-0030 PH: (907) 465-3562/FAX: (907) 465-3075	<input type="checkbox"/> PIPELINE COORDINATOR'S OFFICE 411 WEST 4TH AVENUE, SUITE 2C ANCHORAGE, ALASKA 99501-2343 PH: (907) 271-4317/FAX: (907) 272-0690
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February 4, 1999

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

Dear Ms. Herdrich,

RE: Alaska Army Lands Withdrawal Renewal Draft LEIS

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

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

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

RESPONSES FOR COMMENT X

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

ALT-X033

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

ALT-X034

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

9-71

X

February 4, 1999
Page 2

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

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

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

Sincerely,



Alan Philips
Project Review Coordinator

cc: John Katz, Governor's Office, Washington D. C.
John Sisk, Governor's Office, Juneau
Gabrielle La Rouché, Acting Director, Division of Governmental Coordination
John Shively, Commissioner, Department of Natural Resources
Frank Rue, Commissioner, Department of Fish and Game
Joseph Perkins, Commissioner, Department of Transportation and Public Facilities
Michele Brown, Commissioner, Department of Environmental Conservation
Debby Sedwick, Commissioner, Department Of Commerce and Economic Development

ACC-X013

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

January 31, 1999

Y

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

Dear Ms. Herdrich;

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

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

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

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

RESPONSES TO COMMENT Y

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

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

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

See Chapter 4.23 for existing and proposed mitigation.

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

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

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

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

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

ALT-Y035

USE-Y035

USE-Y036

WATER-Y004

ACC-Y014

USE-Y037

ALT-Y036

9-74

Y

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

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

Sincerely,

Earl F. Malcolm

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

REC-Y005

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

Z

US Army Alaska Land Withdrawal Renewal EIS

Comments 1/22/99 2/5/99

June Thomasson, representing self
3175 Chinoak Drive
Fairbanks, AK 99709

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

June Thomasson

RESPONSES TO COMMENT Z

ALT-Z037

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

USE-Z038

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

ALT-Z038

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

ACC-Z015

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

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

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



AA

United States Department of the Interior

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

ER 98/772

February 5, 1999

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

Dear Ms. Herdrich:

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

General Comments

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

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

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

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

RESPONSES TO COMMENT AA

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

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

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

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

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

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

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

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

OTH-AA012**ALT-AA039**

AA

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

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

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

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

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

Sincerely,



Paul B. Gates

Regional Environmental Officer - Alaska

ALT-AA040

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

SUB-AA006

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

Attachment

AA
ATTACHMENT

Specific Comments

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

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

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

OTH-AA013

OTH-AA013: Added in Final LEIS.

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

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

OTH-AA014

OTH-AA014: Change made to Executive Summary.

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

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

OTH-AA015

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

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

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

ALT-AA041

ALT-AA041: Reworded Executive Summary.

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

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

ALT-AA042

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

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

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

ALT-AA043

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

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

This comment also applies to:

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

AA

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

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

Vol. I, pg. ES-6

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

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

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

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

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

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

The following are suggested to clarify the presentation:

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

ALT-AA044

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

ALT-AA045

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

ALT-AA046

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

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

MIT-AA011

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

ALT-AA047

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

ALT-AA047: No Change Necessary.

AA

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.

AA

Vol. I, pg. I, Table of Contents

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

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.

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.

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.

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

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*.

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.]

OTH-AA017

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

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.)"

OTH-AA018

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

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....

OTH-AA019

OTH-AA019: Change not necessary.

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....

OTH-AA020

OTH-AA020: Change not necessary.

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....

OTH-AA021

OTH-AA021: Change not necessary.

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:

OTH-AA022

OTH-AA022: Change not necessary.

1.2.1 Military Operations Parameters & Training Needs

AA

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.

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 Manuever 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 EIS.

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.

AA

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.

AA

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.

AA

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*.

AA

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

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.

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

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

GEOL-AA002

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.

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

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

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.

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 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."

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:

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.

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

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*.

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

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.

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

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

AA

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.

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

MIN-AA016

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-AA007

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).

AA

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.

WATER-AA010

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

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.

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.

WATER-AA011

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.

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.

VEG-AA002

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.

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.”

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.

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.

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.

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.

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.

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. 3-73, 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-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. 3-78, 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

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..."

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.

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

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.

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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.

WET-AA002
VEG-AA004

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.

OTH-AA028

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.

WILD-AA008

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

Studies of Adelle 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.

WILD-AA009

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.

WILD-AA010

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.

WILD-AA011

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.

REC-AA006

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.

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.

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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.

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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."

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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.

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.

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.

FIRE-AA022

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

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

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

ACC-AA021**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.

ACC-AA022

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

The same comments apply to the following section: [4.17 Recreation](#) page 4-63.

REC-AA008**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.

REC-AA009

REC-AA009: Change completed.

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.

CULT-AA004

CULT-AA004: Corrected in Final LEIS.

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..."

SOC-AA012

SOC-AA012: Corrected in Final LEIS.

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

SOC-AA013

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

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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.

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.

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.

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.

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.

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.

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.

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..."

Vol. I, pg. 6-16

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

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.

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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 Coer
Wilderness Campaign Coordinator

CC

Alaska Army Land Withdrawal Comment/Consensms 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-D0020

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

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

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.

WET-DD003

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.

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

RESPONSES TO COMMENT EE

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

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

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

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

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.

□□□□□□Sincerely,
□□□□□□Randy Bealer

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

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.

OTH-GG034

USE-GG040

POL-GG013

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,

A handwritten signature in cursive script that reads "Richard B. Parkin".

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.

HH

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.

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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.

ACC-II024

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: 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.

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

“(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).

“(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. 670o (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.

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:

“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

State and local governments.

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[S. 1352]

16 USC 670o.

16 USC 670a-1.

“(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).

“(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.

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

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

- 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.

16 USC 670 note.

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."

(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.

(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—

Reports.

(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

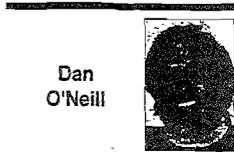
What would you say if the military proposed to shoot 3,500 rockets packed with high explosives into a drainage of the Chena River upstream from the state recreation area? What would you say if, at the same location, they also wanted to drop 4,300 bombs each weighing up to a ton? And, on top of all that, 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 30 years.

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



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likely 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



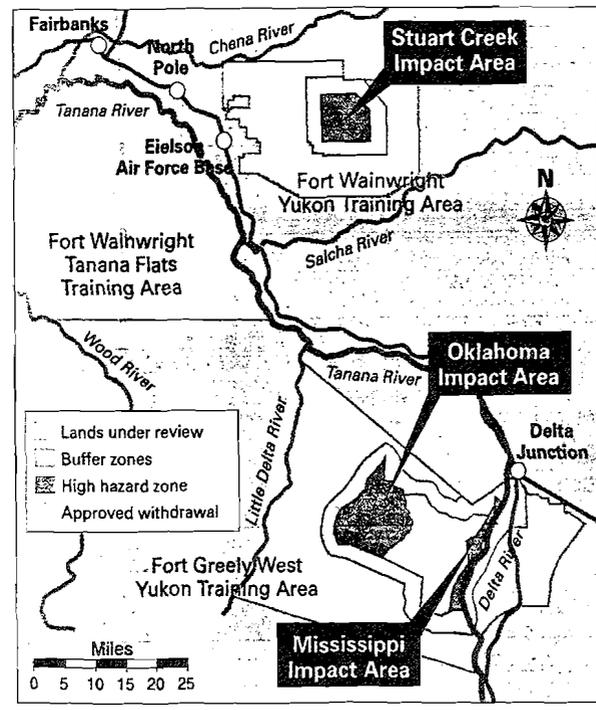
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Army seeks lease extension

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

9-129

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-

nally 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 Cape Thunder air-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.

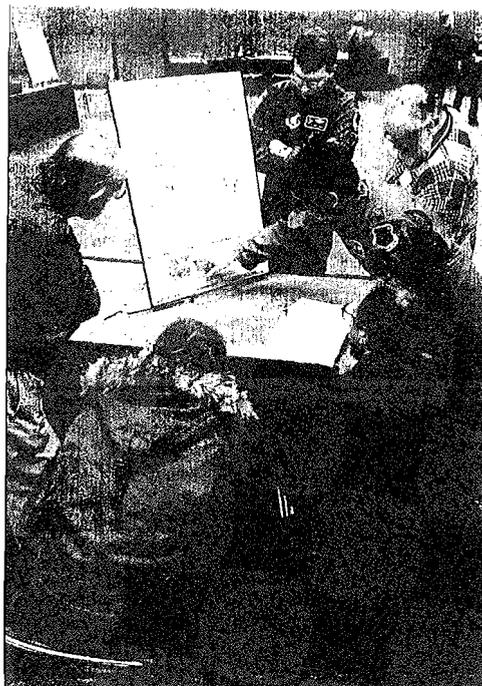
"The Air Force has an easier job cleaning up," observed Bruen, the Army's range manager in Alaska. "The things they're hunting are big enough to be seen, found and destroyed."

"Looking for artillery shells that have dudged—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.

9-131

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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

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.

ALT-KK068

SOC-KK017

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.

KK

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.

KK

- 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 Mobraten, 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, Made 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 collect 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. An exploded

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 would pre-empt the state's

and business will.
④ Military sites in Alaska are among our worst, most persistent toxic waste sites. The military takes a good responsible neighbor line, but their record is shabby. Navy Alaskans do not trust the military to be good, responsible stewards of the land, and with good historical reason.

⑤ Airsteroid mines and bombs are unethical. Altering increased a range 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!"
BFLS Daily News March 12/1999

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 years. Military use will remain the same as in the past 15

USE-MM047

MM

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 (FWS's 248,000 acre "Yukon Training Range and Ft. Greelip'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 K. 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 "Dive got dragging rights ... it feels good to say Dive ban in 30° below zero weather". Caldera's fear of military boards doesn't impinge Alaska, esp. Alaska Natives who live and subsist in 50° (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 dream of deploying more and more soldiers in Alaska. There is a cost to this. This is wisdom, precious and not to be lost.

USE-MM049

USE-MM049: Noted.

land, not a playground; not vacant, not worthless land. (Orinover 1/20/99).

③ Sen Caldera says he wants to portray the US Army as a "good environmental steward". Of '90, 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 ..."

MIT-MM022

MIT-MM022: Noted.

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 these 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 canced 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/MINER 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.

- ⑮ *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.*
- ⑰ *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.*
- ⑱ *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, John D. Lige

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.

USE-MM051

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.

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
 PO Box 1149
 Delta Junction, Alaska 99737
 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

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.

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.*

FIRE-NN028

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.

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.

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

FIRE-NN029: The Gerstle River Test Site is not part of this withdrawal renewal action.

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.

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

NN

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 Stredney

COMMENTOR'S ADDRESS: Mike Stredney
3201 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 18 yrs. How 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

OR

Feb. 7th 98

SUBMIT YOUR COMMENTS AND MAILING REQUESTS VIA THE INTERNET:
<http://www.cemml.colostate.edu/alaskaeis>

648.9 million decontaminated
 Senate McCain - Arz.

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.

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